

# **EPA Jacket 42750-183**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Carolyn Miter  
Albaugh, Inc.  
P.O. Box 2127  
Valdosta, GA 31604

JAN 10 2013

Subject: Notification; Per PR-Notice 2007-4  
Picloram Acid Technical  
EPA Reg. No. 42750-183  
Date Submitted: December 4, 2012

Dear Ms. Miter:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated December 4, 2012 for the product referenced above. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 2007-4 and finds that the action requested falls within the scope of PRN 2007-4. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions regarding this letter, please contact Amaris Johnson at (703) 305-9542 or [johnson.amaris@epa.gov](mailto:johnson.amaris@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis  
Product Manager 25  
Herbicide Branch  
Registration Division (7505P)



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 42750-183	2. EPA Product Manager Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Picloram Acid Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below. <b>NOTIFICATION</b>

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

JAN 10 2013

Label notification to revise Container Disposal instructions under PR Notice 2007-4 as amended April, 2008. This notification is consistent with the provisions of PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

## Section - III

## 1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container

## 3. Location of Net Contents Information

☒ Label ☐ Container

## 4. Size(s) Retail Container

1 gal, 2.5 gal, bulk

## 5. Location of Label Directions

☒ On label attached to container

## 6. Manner in Which Label is Affixed to Product

☒ Lithograph  
Paper glued  
Stenciled☐ Other \_\_\_\_\_

## Section - IV

## 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Carolyn Miter	Title Registrations Specialist	Telephone No. (Include Area Code) 229-244-3280
-----------------------	-----------------------------------	---

## Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

8. Date Application Received  
(Stamped)

## 2. Signature

## 3. Title

Registrations Specialist

## 4. Typed Name

Carolyn Miter

## 5. Date

December 4, 2012

PICLORAM ACID TECHNICAL

For Manufacturing Use Only

NOTIFICATION

JAN 10 2013

ACTIVE INGREDIENT:

Picloram: 4-amino-3, 5, 6-trichloropyridine-2-carboxylic acid ..... 93.0%

OTHER INGREDIENTS: ..... 7.0%

TOTAL: ..... 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

HOT LINE NUMBER: Contact CHEMTREC (800) 424-9300 for transport or emergency medical treatment information.

EPA File Symbol 42750-183

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS: \_\_\_\_\_

NOTIFICATION

JAN 10 2013

MANUFACTURED FOR:

Albaugh, Inc.  
Ankeny, IA 50021

NOTIFICATION

JAN 10 2013

PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following uses: rangeland and permanent grass pastures; barley,



oats and wheat; fallow cropland; Conservation Reserve Program (CRP); forests; non-cropland. Because of their properties and intended uses, herbicidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finishing formulations, and are responsible for obtaining EPA registration of these products.

This product may be used to formulate products for specific use(s) not listed on the MP label if:

1. The formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).
2. End-use products which have an EPA approved stewardship program in place.

#### HANDLING PRECAUTIONS

Do not contaminate water: Do not allow this product to contaminate water used for irrigation, drinking or other domestic purposes. Do not clean containers near water used for these purposes.

Do not contaminate atmosphere: When formulating dry products, do not allow dust particles from this product to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in original container in a cool, dry area. Open dumping is prohibited.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

~~CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.~~

**CONTAINER DISPOSAL: Non-refillable container. DO NOT reuse or refill this container.**

**Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. If not emptied in this manner, the liner may be considered an acute hazardous waste and disposed in accordance with local, state and federal regulations.**

**When completely empty, offer for recycling, if available, or dispose of liner in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. If drum or other outer container is contaminated and cannot be reused, dispose of in the manner required for its liner.**

#### WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

Fed-Ex

December 4, 2012

Document Processing Desk (NOTIFY)  
Mr. Bo Davis (PM 25)  
Registration Division  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
One Potomac Yard (South Bldg)  
2777 South Crystal Dr.  
Arlington, VA 22202

Re: Picloram Acid Technical  
EPA Reg. No. 42750-183  
PR Notice 2007-4

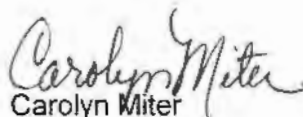
Dear Mr. Davis,

The enclosed submission is for the above captioned registration Container Disposal revision.

<sup>one</sup>  
~~Three~~ copies of the draft label with changes noted with strikeout/bold text are enclosed. One clean copy is enclosed. The PRN certification statement is listed on the Form 8570-1.

Should you have any questions, please do not hesitate to call me or e-mail. Thank you and have a great day.

Sincerely,



Carolyn Miter  
Albaugh, Inc.  
Registrations Specialist  
229-244-3288  
carolynm@albaughinc.com

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Morris Gaskins  
Albaugh Inc.  
P.O. Box 2127  
Valdosta, GA 31604

FEB 17 2012

Dear Mr. Gaskins:

Subject: Storage Stability and Corrosion Characteristics Studies  
Picloram Acid Technical  
EPA Registration No. 42750-183  
Submission Date: October 4, 2010

The Agency has reviewed the Storage Stability (830.6317) and the Corrosion Characteristics Study (830.6320) submitted as required by the Notice of Pesticide Registration dated May 12, 2008 for the product referenced above. It has been determined that the studies are acceptable to support the registration of this product. A complete copy of the review has been included with this letter for your information. No further product chemistry information is required for this product at this time. If you have any questions regarding this letter, please contact me at (703) 306-0415 or at [davis.kable@epa.gov](mailto:davis.kable@epa.gov).

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis  
Product Manager (25)  
Herbicide Branch  
Registration Division (7505P)

Enclosure- Agency Review (D390204)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

**DATE OUT:** February 16, 2012

**SUBJECT:** Storage Stability and Corrosion Studies - Product Chemistry Review

**FROM:** Linda Mascall / Hari Mukhoty  
Product Chemistry Team  
Technical Review Branch / Registration Division (7505P)

*Handwritten signature*

*Handwritten signature*  
2/16/12

**TO:** Dianne Morgan / Kathryn Montague  
Kable Davis  
Shaunta Hill / Shaja Joyner  
Erin Malone / Mary Waller  
Registration Division (7505P)

**Company Name / Number:** ALBAUGH INC. / 42750

**INTRODUCTION:**

In support of previous applications, the company / applicant has submitted the one year Storage Stability and Corrosion Characteristics studies for the following products:

PM	Reg. Nos.	DP Barcodes	Decision Nos.	MRID Nos.	PC Codes
23	42750-23	D369196	419196	478305-01	030554
25	42750-183	D390204	441564	482552-01	005101
20	42750-215	D396850	458551	486553-01	109101
21	42750-219	D393339	453863	485597-01	113501

**SUMMARY OF FINDINGS:**

The Technical Review Branch has performed a fast track review of the associated products and concludes all of the studies are "acceptable". No products exhibited degradation of the active ingredient(s) in the products or corrosion of the packing material were observed during the period of testing.

CORPORATE OFFICE  
1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 (Phone)  
800.247.8013 (Toll Free)  
515.964.7813 (FAX)

# ALBAUGH, INC.

GEORGIA OFFICE  
P.O. Box 2127  
Valdosta, GA 31604-2127  
229.244.3288 (Phone)  
229.244.5841 (FAX)

**482552-00**

Fed-X

October 4, 2010

Mr. Jim Tompkins (PM 25)  
Registration Division  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
2777 South Crystal Dr.  
Arlington, VA 22202

RE: Picloram Acid Technical  
EPA Reg. No. 42750-183

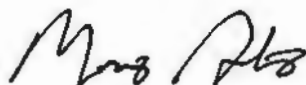
Dear Mr. Tompkins,

The enclosed submission for the above referenced registration is the following product chemistry data:

**48255201** • OPPTS Guideline 830.6317 12-Month Storage Stability and 830.6320 Corrosion Characteristics  
(3 copies)

Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager  
Albaugh, Inc.  
229-244-3288

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United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 42750-183	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Picloram Acid Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of 12-Month Storage Stability (830.6317) and Corrosion Characteristics (830.6320) product chemistry data

**Section - III**

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container
		If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Morris Gaskins	Title Registrations Manager	Telephone No. (Include Area Code) 229-244-3288	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Registrations Manager		
4. Typed Name Morris Gaskins	5. Date October 4, 2010		

# MATERIAL TO BE ADDED TO JACKET

REG #

42750-183

Description:

Notification PRN 98-10

check all that apply		
<input type="checkbox"/>	new stamped accepted label	Send to CSC
<input type="checkbox"/>	new CSF	
<input checked="" type="checkbox"/>	notification	

## Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's

Name:

MARIA I Rodriguez

Date:

6-3-11

Phone:

305-6710

Division:

AD





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAY 27 2011

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Mr. Morris Gaskins  
Albaugh, Inc.  
P.O. Box 2127  
Valdosta, GA 31604

Dear Mr. Gaskins:

The Agency is in receipt (S852144/D415322; Code 332) of the following Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10:

Product

CSF

EPA Reg No 42750-183  
*Picloram Acid Technical*

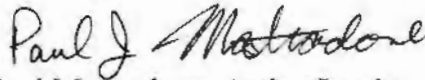
Basic, May 22, 2009

The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The Confidential Statement of Formula (CSF) submitted with the application is considered "not acceptable" at this time.

The transmittal letter indicates that this product will be "100% repacked" at another establishment. The information provided in Box #2 of the CSF lists two different companies (and establishment numbers). In Box #14 of the CSF it is indicated that the active ingredient is supplied by a different company and not yours. It is not clear if you intend to repack another registered product or if another company will distribute your product. If you intend to repack another product, you need to submit EPA Form 8570-1, "Application for Pesticide Registration" and obtain a new EPA Registration Number for that product. If you intend for another company to distribute your product, you need to submit EPA Form 8570-5, "Notice of Supplemental Distribution of a Registered Product."

If you have any questions, please call me directly at 703-305-5335 or María I. Rodríguez of my staff at 703-305-6710.

Sincerely,

A handwritten signature in black ink that reads "Paul J. Mastradone". The signature is written in a cursive style with a large, stylized "P" and "M".

Paul Mastradone, Acting Leader  
Notifications & Minor Formulations Team  
Registration Division (7505P)  
Office of Pesticide Programs



CORPORATE OFFICE  
1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 - Office  
800.247.8013 - Toll Free  
515.964.7813 - Facsimile

**ALBAUGH, INC.**

S 852144  
IDH15322  
Cn 332

72-150-783  
Valdosta Office  
P.O. Box 2127  
304 Janet Street, Suite H  
Valdosta, GA 31604  
229.244.3288 - Office  
229.244.5841 - Facsimile

FED-X

CSF  
-Danic

May 22, 2009

Document Processing Desk (NOTIFY)  
Registration Division  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
One Potomac Yard (South Bldg)  
2777 South Crystal Dr.  
Arlington, VA 22202

RE: Clopyralid Technical Herbicide  
EPA Reg. No. 42750-184

Picloram Acid Technical  
EPA Reg. No. 42750-183

Dear Sirs,

The enclosed submissions for the above referenced registrations are notifications of alternate CSFs under PR Notice 98-10 advising the Agency that these products will be 100% repacked at the establishment noted on the CSFs.

No changes in the composition of the product will be made.

Please call if you have any questions.

Regards,

*Morris Gaskins*

Morris Gaskins  
Registrations Manager  
Albaugh, Inc.  
P.O. Box 2127  
Valdosta, GA 31604  
229-244-3288

↳ Repackaging  
but not 100% re-packing  
of another registered  
product?  
MM

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585 2144

Please read instructions on reverse before completing form.

Form Approved EPA No. 2070-0060, Approval expires 2-28-95



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

### Application for Pesticide - Section I

1. Company/Product Number 42750-183	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Picloram Acid Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

### Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

NOTIFICATION

MAY 27 2009

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of adding repack establishment per PR Notice 98-10

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no further changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

### Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> Attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Morris Gaskins	Title Registrations Manager	Telephone No. (Include Area Code) 229-244-3288
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Registrations Manager	
4. Typed Name Morris Gaskins	5. Date May 22, 2009	

*Subst*

## DATA PACKAGE BEAN SHEET

Date: 31-May-2011

Page 1 of 2

Decision #: 441564

DP #: (390204)

NON PRIA

Parent DP #:

Submission #: 883527

### \*\*\* Registration Information \*\*\*

Registration: 42750-183 - PICLORAM ACID TECHNICAL

Company: 42750 - ALBAUGH INC

Risk Manager: RM 25 - Kable Davis - (703) 306-0415 Room# PY1 S-7319

Risk Manager Reviewer: Philip Errico PERRIC02

Sent Date: 07-Oct-2010

Calculated Due Date: 25-Jan-2011

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (570) CONDITIONAL REGISTRATION FOLLOW-UP;DATA REQUIRED;REQUIRES RD REVII

Ingredients: 005101, Picloram(93%)

### \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 31-May-2011

Due Back: \_\_\_\_\_

DP Ingredient: 005101, Picloram

DP Title: One yr. storage & corrosion charact.

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: \_\_\_\_\_

#### Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 16-Nov-2010

Team Name: CHEM

Science Due Date: \_\_\_\_\_

Reviewer Name: \_\_\_\_\_

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

### \*\*\* Studies Sent for Review \*\*\*

Printed on Page 2

### \*\*\* Additional Data Package for this Decision \*\*\*

No Additional Data Packages

### \*\*\* Data Package Instructions \*\*\*

Please review one year storage stability and corrosion characteristics study, and provide opinion on its acceptability to satisfy respective data requirements.

Thanks,

Phil Errico 703-305-6663

*To RD/TRB for review*

DP#: (390204)

\*\*\* Studies Sent for Review \*\*\*

Decision#: (441564)

MRID	MRID Status	Citation Reference	Guideline
48255201		Gravelle, W. (2009) Storage Stability and Corrosion Charactersitics: Picloram Technical Acid, NUP-06094. Project Number: P800, 25119. Unpublished study prepared by Eurofins/Product Safety Laboratories. 29 p.	830.6317/Storage stability
48255201		Gravelle, W. (2009) Storage Stability and Corrosion Charactersitics: Picloram Technical Acid, NUP-06094. Project Number: P800, 25119. Unpublished study prepared by Eurofins/Product Safety Laboratories. 29 p.	830.6320/Corrosion characteristics

**CORPORATE OFFICE**  
1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 (Phone)  
800.247.8013 (Toll Free)  
515.964.7813 (FAX)

# ALBAUGH, INC.

**GEORGIA OFFICE**  
P.O. Box 2127  
Valdosta, GA 31604-2127  
229.244.3288 (Phone)  
229.244.5841 (FAX)

**482552-00**

Fed-X

October 4, 2010

Mr. Jim Tompkins (PM 25)  
Registration Division  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
2777 South Crystal Dr.  
Arlington, VA 22202

RE: Picloram Acid Technical  
EPA Reg. No. 42750-183

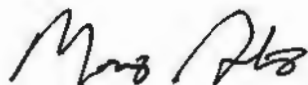
Dear Mr. Tompkins,

The enclosed submission for the above referenced registration is the following product chemistry data:

**48255201** • OPPTS Guideline 830.6317 12-Month Storage Stability and 830.6320 Corrosion Characteristics  
(3 copies)

Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager  
Albaugh, Inc.  
229-244-3288

**Agri Star**™  
By Albaugh, Inc.

PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS  
[www.albaughinc.com](http://www.albaughinc.com)





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 42750-183	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Picloram Acid Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of 12-Month Storage Stability (830.6317) and Corrosion Characteristics (830.6320) product chemistry data

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Morris Gaskins		Title Registrations Manager		Telephone No. (Include Area Code) 229-244-3288	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					8. Date Application Received (Stamped)
2. Signature 		3. Title Registrations Manager			
4. Typed Name Morris Gaskins		5. Date October 4, 2010			

**Receipt for Section 3**

S:  Resubmission: ☒ Yes ☐ No

Regulatory Type:  Fee For Service: ☐ Yes ☒ No

Application Type:  Billable: ☐ Yes ☒ No

Company:

Risk Manager:

Product #:  Product Name:

Override#:

Me Too Section3:  Me Too Product Name:

Application Date:   OPP Rec'd Date:

Front End Date:   Risk Manager Send Date:

FFS Due Date:  Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

Form A: ☐ Signature Date:  Form B: ☐ Signature Date:

Receipt Content	Des
Study	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

October 13, 2010

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

ALBAUGH INC  
1525 NE 36TH STREET  
ANKENY, IA 50021

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 07-OCT-10. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

## Memorandum

Date: 10/20/10

To: PM 25, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ **fully accepted submission**  
☐ partially accepted submission  
☐ rejected submission

Completion of 21-Day Content Screen

PM- 85

EPA Reg. # (File Symbol) 143750 18-2

Decision # D 1E

Data package delivered to  
you on 12/26/11.  
(date)

Jacket/Mini-jacket will be  
transferred to you today.  
(Pick up from Document Center)

Thank you,

Registration Division's 21-Day Content Team

# Material to be added to an e-Jacket

Reg. No. 42750-183

*No D #*

## 1. Placement within the e-Jacket:

☒ Default: chronological top

Other: (PDF page number, i.e., "before page 45")

## 2. Is this material:

☒ Newly stamped accepted label

Notification

New CSF

Final Printed Label

Other: \_\_\_\_\_

*No label in PPLS  
Registered since 2008.  
Use May 12, 2008  
stamped label.*

3. Attach this notice on top of the material. It must be clipped all together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Phil Erwin

Phone: 305-6663 Division: RD

Date: 10/28/10



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs

Registration Division (R7505C)

401 "M" St., S.W.

Washington, D.C. 20460

NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration

(under FIFRA, as amended)

EPA Reg. Number:

42750-183

Date of Issuance:

MAY 12 2008

Term of Issuance: Conditional

Name of Pesticide Product:

Picloram Acid  
Technical

Name and Address of Registrant (include ZIP Code):

Mr. Morris Gaskins  
Albaugh, Inc.  
P.O. Box 2127  
Valdosta, GA 31604-2127

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data.

2. Make the following changes to your labeling:

a. Change the registration number to "42750-183".

Approving Official

Date

5-12-08

b. Make all of the changes specified in the attached document "Summary of comments on 42750-00RIG.20080507.epacomments.pdf".

c. Submit one-year storage stability (Guideline 830.6317) and corrosion characteristics (Guideline 830.6317) studies for this product conducted under warehouse conditions. It is recommended that observations be made at 0, 3, 6, 9, and 12 month intervals.

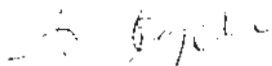
d. Submit UV/Visible absorption data (Guideline 830.7050) within 30 days of the date of this letter.

e. Submit final labeling for this product **within 30 days** of the date of this letter.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

If you have any questions about this letter, please contact Tobi Colvin-Snyder at 703-305-7801.

  
Jim Tompkins  
Product Manager (25)  
Herbicide Branch  
Registration Division (7505C)



## PICLORAM ACID TECHNICAL

For Manufacturing Use Only

### ACTIVE INGREDIENT

Picloram: 4-amino-3, 5, 6-trichloropyridine-2-carboxylic acid ..... 93.0%

OTHER INGREDIENTS ..... 7.0%

TOTAL: ..... 100.0%

KEEP OUT OF REACH OF CHILDREN

### WARNING

### FIRST AID

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

**HOT LINE NUMBER:** Contact CHEMTREC (800) 424-9300 for transport or emergency medical treatment information.

EPA File Symbol 42750-RIG

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS \_\_\_\_\_

MANUFACTURED FOR  
Albaugh, Inc.  
Ankeny, IA 50021

ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
**MAY 12, 2008**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

42750-188

Only for formulation into a herbicide for the following uses: rangeland and permanent grass pastures; barley, oats and wheat; fallow cropland; Conservation Reserve Program (CRP); forests, non-cropland. Because of their properties and intended uses, herbicidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finishing formulations, and are responsible for obtaining EPA registration of these products.

This product may be used to formulate products for specific use(s) not listed on the MP label if:

1. The formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).
2. End-use products which have an EPA approved stewardship program in place.

#### HANDLING PRECAUTIONS

**Do not contaminate water:** Do not allow this product to contaminate water used for irrigation, drinking or other domestic purposes. Do not clean containers near water used for these purposes.

**Do not contaminate atmosphere:** When formulating dry products, do not allow dust particles from this product to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

~~PESTICIDE DISPOSAL: Open dumping is prohibited. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional office for guidance.~~  
~~CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.~~

#### WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

# Summary of Comments on 042750-00RIG.20080507.epacommments.pdf

---


Page: 2

---

Author: tsnyder

Subject: Replacement Text

Date: 5/8/2008 12:21:51 PM

 Pesticide Storage: Store in original container in a cool, dry area. Open dumping is prohibited.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility

Container Disposal: Completely empty bag into application equipment. Then dispose of bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke

---



# U.S. Environmental Protection Agency Office of Pesticide Programs Information Network

## Results

1 Items Found

### Registration #

1) [35935-GO](#)



### ERROR REPORTING

[Report Data Errors](#)

### DETAILS

[Summary](#)

[Sites / Pests](#)

[Site / Pest Matrix](#)

[Studies](#)

[Data Requirements](#)

[Repository](#)

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[Product Details](#)

[Related Products](#)

[DCI](#)

[Transfer History](#)

[Back to Query](#)

### SUMMARY REPORTS

[Registrations](#)

[Registrations /  
Transferred](#)

### OPTIONS

[Help](#)

[Logout](#)

## Summary Information For Product Registration - Section 3 42750-183

This product has been transferred.

**Registration #:** 42750-183

**Registration Name:** [PICLORAM ACID TECHNICAL](#)

**Company:** [42750 - ALBAUGH INC](#)

**Current Status:** [Active - Registered \(12-May-2008\)](#)

**Restricted Use:** No

### Active Ingredients

PC Code	CAS #	Ingredient Name	Percent Active
<a href="#">005101</a>	1918-02-1	Picloram	93
Total Rows: 1			

**Organization:** RD / HB

**Team:** Registration Division, Risk Management Team 25  
Tompkins, James (703) 305-5697

**Child Resistant Package:**

**Signal Word:** Danger

**Physical Form:** Technical Chemical

**Pesticide Category:**

**Label Image:** [View Label Image](#)



United States  
Environmental Protection Agency  
Washington, DC 20460

☒ Registration  
☐ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 42750-RIG	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Picloram Acid technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>5/6/08</u>	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of Data Matrices, Data Certification form and revised draft label in response to EPA telephone request

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5 gal		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Morris Gaskins		Title Registrations Manager	
		Telephone No. (Include Area Code) 229-244-3288	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Registrations Manager	
4. Typed Name Morris Gaskins		5. Date May 6, 2008	

## PICLORAM ACID TECHNICAL

For Manufacturing Use Only

### ACTIVE INGREDIENT:

Picloram: 4-amino-3, 5, 6-trichloropyridine-2-carboxylic acid ..... 93.0%

OTHER INGREDIENTS: ..... 7.0%

TOTAL: ..... 100.0%

KEEP OUT OF REACH OF CHILDREN

### WARNING

### FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

HOT LINE NUMBER: Contact CHEMTREC (800) 424-9300 for transport or emergency medical treatment information.

EPA File Symbol 42750-RIG

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS: \_\_\_\_\_

### MANUFACTURED FOR:

Albaugh, Inc.  
Ankeny, IA 50021

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following uses: rangeland and permanent grass pastures, barley, oats and wheat; fallow cropland; Conservation Reserve Program (CRP); forests; non-cropland. Because of their properties and intended uses, herbicidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finishing formulations, and are responsible for obtaining EPA registration of these products.

This product may be used to formulate products for specific use(s) not listed on the MP label if:

1. The formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).
2. End-use products which have an EPA approved stewardship program in place.

#### HANDLING PRECAUTIONS

Do not contaminate water: Do not allow this product to contaminate water used for irrigation, drinking or other domestic purposes. Do not clean containers near water used for these purposes.

Do not contaminate atmosphere: When formulating dry products, do not allow dust particles from this product to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

~~PESTICIDE DISPOSAL: Open dumping is prohibited. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional office for guidance.~~  
~~CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.~~

#### WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

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EPA File Symbol 42750-RIG

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS \_\_\_\_\_

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Albaugh, Inc.  
Ankeny, IA 50021

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#### WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.



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**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604	EPA Registration Number/File Symbol 42750-RIG
Active Ingredient(s) and/or representative test compound(s) picloram	Date 5/6/08
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) terrestrial food use, terrestrial non-food use	Product Name Picloram Acid Technical

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT** (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

May 6, 2008


Typed or Printed Name and Title

Morris Gaskins Registrations Manager

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<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 1525 NE 36th St. Ankeny, IA 50021			<b>Product:</b>  <b>PICLORAM ACID TECHNICAL</b>		
<b>Ingredient:</b> Picloram Acid CAS # 1918-02-1					
<b>Guideline Reference</b>	<b>Guideline Study Name</b>	<b>MRID Number</b>	<b>Submitter</b>	<b>Status</b>	<b>Note</b>
830.1550	Product Identity and Composition	470807-01	Nufarm	PER	
830.1600	Description of Materials Used to Produce the	470807-01	Nufarm	PER	
830.1620	Description of Product Process	470807-01	Nufarm	PER	
830.1650	Description of Formulation Process				Waiver <sup>2</sup>
830.1670	Description of Formation of Impurities	470807-01	Nufarm	PER	
830.1700	Preliminary Analysis	470807-02	Nufarm	PER	
830.1750	Certified Limits	470807-02	Nufarm	PER	
830.1800	Enforcement Analytical Method	470807-02	Nufarm	PER	
830.6302	Color	471219-01	Nufarm	PER	
830.6303	Physical State	471219-01	Nufarm	PER	
830.6304	Odor	471219-01	Nufarm	PER	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	471219-01	Nufarm	PER	
830.6314	Oxidation/Reduction: Chemical Incompatibility				Waiver <sup>4</sup>
830.6315	Flammability	471219-01	Nufarm	PER	
830.6316	Explosability	471219-01	Nufarm	PER	
830.6317	Storage Stability				In progress <sup>6</sup>
<b>Signature</b> 		<b>Name and Title:</b> Morris Gaskins Registrations Manager			<b>Date:</b> 5/6/08

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830.6319	Miscibility	470807-01	Nufarm	PER	Not req'd <sup>1</sup>
830.6320	Corrosion Characteristics				In progress <sup>6</sup>
830.6321	Dielectric Breakdown Voltage	470807-01	Nufarm	PER	Not req'd <sup>1</sup>
830.7000	pH	471219-01	Nufarm	PER	
830.7050	UV/Visible Absorption	462707-03	Albaugh	OWN	
830.7100	Viscosity	470807-01	Nufarm	PER	Not req'd <sup>1</sup>
830.7200	Melting Point/Melting Range	471219-01	Nufarm	PER	
830.7220	Boiling Point/Boiling Range				Waiver <sup>3</sup>
830.7300	Density/Relative Density/Bulk Density	471219-01	Nufarm	PER	
830.7370	Dissociation Constants in Water	471219-01	Nufarm	PER	
830.7520	Particle Size, fiber length, and diameter distribution	471219-01	Nufarm	PER	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	471219-01	Nufarm	PER	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Waiver <sup>4</sup>
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Waiver <sup>4</sup>
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 5/6/08

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<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID Number</b>	<b>Submitter</b>	<b>Status</b>	<b>Note</b>
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	471219-01	Nufarm	PER	
830.7860	Water Solubility, Generator Column Method				Waiver <sup>5</sup>
830.7950	Vapor Pressure	471219-01	Nufarm	PER	
870.1100	Acute Oral Toxicity - Rat	CITE ALL		PAY	
870.1200	Acute Dermal Toxicity - Rat	CITE ALL		PAY	
870.1300	Acute Inhalation Toxicity - Rat	CITE ALL		PAY	
870.2400	Primary Eye Irritation - Rabbit	CITE ALL		PAY	
870.2500	Primary Dermal Irritation	CITE ALL		PAY	
870.2600	Dermal Sensitization	CITE ALL		PAY	
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 5/6/08



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<b>Ingredient:</b> Picloram Acid CAS # 1918-02-1					
<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID</b>	<b>Submitter (EPA Co. No.)</b>	<b>Status</b>	<b>Note</b>
<b>Picloram generic data requirements</b>					
Albaugh will make offers-to-pay to the following companies that appear on the current data submitters list.					
Picloram Generic Data	Cite-All		Nufarm Americas (228)	PAY	
Picloram Generic Data	Cite-All		Dow Chemical	PAY	
Picloram Generic Data	Cite-All		Reckitt Benckiser (475)	PAY	
Picloram Generic Data	Cite-All		Reckitt Benckiser (777)	PAY	
Picloram Generic Data	Cite-All		BASF Corp. (7969)	PAY	
Picloram Generic Data	Cite-All		Nufarm Ltd. (35935)	PAY	
Picloram Generic Data	Cite-All		BASF Sparks LLC. (51036)	PAY	
Picloram Generic Data	Cite-All		Dow AgroSciences (62719)	PAY	
Picloram Generic Data	Cite-All		SDTF (66607)	PAY	
Picloram Generic Data	Cite-All		United Phosphorous (70506)	PAY	
Picloram Generic Data	Cite-All		Endangered Species TF (73989)	PAY	
Picloram Generic Data	Cite-All		Residential Exposure JV (74888)	PAY	
Picloram Generic Data	Cite-All		Generic Endangered Species TF (84653)	PAY	
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 5/6/08

Footnotes for PICLORAM ACID TECHNICAL Data Matrix  
(page 5 of 5)

Footnote 1

- 830.6319 Miscibility
- 830.6321 Dielectric Breakdown
- 830.7100 Viscosity

This data is not required for Technical Grade products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

Footnote 2

- 830.6350 Formulation Process

Albaugh requests a waiver for this data requirement. Picloram Acid Technical product is not deliberately formulated. See Guideline 830.1620.

Footnote 3

- 830.7220 Boiling Point/Range

Albaugh requests a waiver for this data requirement. Picloram Acid Technical is a solid.

Footnote 4

- 830.7560 Partition Coefficient, Generator Column Method
- 830.7560 Partition Coefficient, Liquid Chromatography Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7570 Liquid Chromatography Method.

Footnote 5

- 830.7860 Water Solubility, Generator Column Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7840 Shake Flask Method.

Footnote 6

- 830.6317 Storage Stability
- 830.6320 Corrosion Characteristics

Studies to generate the required data have been commissioned. Albaugh requests a conditional registration pending submittal of the required data 12 months after study initiation.

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Form Approved OMB No. 2070-0060

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**Ingredient:** Picloram Acid CAS # 1918-02-1

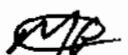
Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
			Nufarm	PER	
			Nufarm	PER	
			Nufarm	PER	
					Waiver <sup>2</sup>
			Nufarm	PER	
			Nufarm	PER	
			Nufarm	PER	
			Nufarm	PER	
			Nufarm	PER	
			Nufarm	PER	
			Nufarm	PER	
			Nufarm	PER	
					Waiver <sup>4</sup>
			Nufarm	PER	
			Nufarm	PER	
					In progress <sup>6</sup>
Signature			Name and Title: Morris Gaskins Registrations Manager		Date: 5/6/08



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<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID Number</b>	<b>Submitter</b>	<b>Status</b>	<b>Note</b>
			Nufarm	PER	Not req'd <sup>1</sup>
					In progress <sup>6</sup>
			Nufarm	PER	Not req'd <sup>1</sup>
			Nufarm	PER	
			Albaugh	OWN	
			Nufarm	PER	Not req'd <sup>1</sup>
			Nufarm	PER	
					Waiver <sup>3</sup>
			Nufarm	PER	
			Nufarm	PER	
			Nufarm	PER	
			Nufarm	PER	
					Waiver <sup>4</sup>
					Waiver <sup>4</sup>
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 5/6/08

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			Nufarm	PER	
					Waiver <sup>5</sup>
			Nufarm	PER	
				PAY	
				PAY	
				PAY	
				PAY	
				PAY	
				PAY	
			<b>Signature</b> 		

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			Nufarm Ltd. (35935)	PAY	
			BASF Sparks LLC. (51036)	PAY	
			Dow AgroSciences (62719)	PAY	
			SDTF (66607)	PAY	
			United Phosphorous (70506)	PAY	
			Endangered Species TF (73989)	PAY	
			Residential Exposure JV (74888)	PAY	
			Generic Endangered Species TF (84653)	PAY	
<b>Signature</b> 		<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 5/6/08	

Footnotes for PICLORAM ACID TECHNICAL Data Matrix  
(page 5 of 5)

Footnote 1

- 830.6319 Miscibility
- 830.6321 Dielectric Breakdown
- 830.7100 Viscosity

This data is not required for Technical Grade products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

Footnote 2

- 830.6350 Formulation Process

Albaugh requests a waiver for this data requirement. Picloram Acid Technical product is not deliberately formulated. See Guideline 830.1620.

Footnote 3

- 830.7220 Boiling Point/Range

Albaugh requests a waiver for this data requirement. Picloram Acid Technical is a solid.

Footnote 4

- 830.7560 Partition Coefficient, Generator Column Method
- 830.7560 Partition Coefficient, Liquid Chromatography Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7570 Liquid Chromatography Method.

Footnote 5

- 830.7860 Water Solubility, Generator Column Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7840 Shake Flask Method.

Footnote 6

- 830.6317 Storage Stability
- 830.6320 Corrosion Characteristics

Studies to generate the required data have been commissioned. Albaugh requests a conditional registration pending submittal of the required data 12 months after study initiation.

## PICLORAM ACID TECHNICAL

For Manufacturing Use Only

### ACTIVE INGREDIENT:

Picloram: 4-amino-3, 5, 6-trichloropyridine-2-carboxylic acid ..... 93.0%

OTHER INGREDIENTS: ..... 7.0%

TOTAL: ..... 100.0%

KEEP OUT OF REACH OF CHILDREN

### WARNING

### FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

HOT LINE NUMBER: Contact CHEMTREC (800) 424-9300 for transport or emergency medical treatment information.

EPA File Symbol 42750-RIG

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS: \_\_\_\_\_

### MANUFACTURED FOR:

Albaugh, Inc.  
Ankeny, IA 50021

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following uses: rangeland and permanent grass pastures; barley, oats and wheat; fallow cropland; Conservation Reserve Program (CRP); forests; non-cropland. Because of their properties and intended uses, herbicidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finishing formulations, and are responsible for obtaining EPA registration of these products.

This product may be used to formulate products for specific use(s) not listed on the MP label if:

1. The formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).
2. End-use products which have an EPA approved stewardship program in place.

#### HANDLING PRECAUTIONS

Do not contaminate water: Do not allow this product to contaminate water used for irrigation, drinking or other domestic purposes. Do not clean containers near water used for these purposes.

Do not contaminate atmosphere: When formulating dry products, do not allow dust particles from this product to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL: Open dumping is prohibited. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional office for guidance. CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

#### WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

## PICLORAM ACID TECHNICAL

For Manufacturing Use Only

### ACTIVE INGREDIENT:

Picloram: 4-amino-3, 5, 6-trichloropyridine-2-carboxylic acid ..... 93.0%

OTHER INGREDIENTS: ..... 7.0%

TOTAL: ..... 100.0%

KEEP OUT OF REACH OF CHILDREN

### WARNING

### FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

HOT LINE NUMBER: Contact CHEMTREC (800) 424-9300 for transport or emergency medical treatment information.

EPA File Symbol 42750-RIG

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS: \_\_\_\_\_

### MANUFACTURED FOR:

Albaugh, Inc.  
Ankeny, IA 50021

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

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#### LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.



EPA

**Picloram Acid Technical**

For Manufacturing Use Only

1404

**ACTIVE INGREDIENT:**

Picloram: 4-amino-3,5,6-trichloropicolinic acid ..... 95.0%

**OTHER INGREDIENTS:** ..... 5.0%**TOTAL:** ..... 100.0%**KEEP OUT OF REACH OF CHILDREN****WARNING****FIRST AID**

If in eyes:	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
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**HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.

**PRECAUTIONARY STATEMENTS****HAZARDS TO HUMANS AND DOMESTIC ANIMALS****WARNING**

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

EPA Reg. No. 42750-

Manufactured for:  
Albaugh, Inc.  
Ankeny, IA 50021

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

42750-78

MAY 16 2005

EPA Est. No.

NET WEIGHT  
\_\_\_\_ Lbs.

**FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE,  
CALL CHEMTREC (800) 424-9300**

No employee or agent of ALBAUGH, INC. or the Seller is authorized to vary or exceed the terms of this Warranty in any other manner.

**DISCLAIMER AND INDEMNITY FOR FORMULATORS' USES**

The manufacturer expressly disclaims all liability for claims and actions (whether based on contract, tort, strict liability, or breach of warranty) arising out of, resulting from or connected with a formulation containing this product when used for any purpose other than those uses set forth in the Directions for Use. The manufacturer has not developed scientific data to support, nor has it explicitly or implicitly approved, any uses other than those in the Directions for Use.

Any formulator or buyer who uses this product in formulations for any other than those stated in the Directions for Use above assumes all liability for claims and actions arising out of, connected with or resulting from such use and agrees by so using this product to indemnify and hold harmless the manufacturer from such claims and actions.

This Disclaimer and Indemnity is in addition to, not in lieu of, the above Conditions of Sale and Warranty.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**Only for formulation into a herbicide for the following uses:** barley, oats and wheat; fallow cropland; rangeland and permanent grass pastures; Conservation Reserve Program (CRP); forests; noncropland.

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

## STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a cool, dry area. Open dumping is prohibited.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

## CONDITIONS OF SALE AND WARRANTY

The **DIRECTIONS FOR USE** of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of ALBAUGH, INC. or the Seller. All such risks shall be assumed by the Buyer.

ALBAUGH, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. **ALBAUGH, INC. MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS FOR ANY PARTICULAR PURPOSE OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS.**

**BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED.** When Buyer suffers losses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict liability, or other legal theories), Buyer must promptly notify Seller in writing of any claims to be eligible to receive either remedy stated above. **IN NO CASE SHALL ALBAUGH, INC. OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.** ALBAUGH, INC. and the Seller offer this product, and the Buyer accepts it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of ALBAUGH, INC.

## PICLORAM ACID TECHNICAL

For Manufacturing Use Only

### ACTIVE INGREDIENT:

Picloram: 4-amino-3, 5, 6-trichloropyridine-2-carboxylic acid ..... 93.0%

OTHER INGREDIENTS: ..... 7.0%

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KEEP OUT OF REACH OF CHILDREN

### WARNING

### FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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EPA File Symbol 42750-RIG

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS: \_\_\_\_\_

### MANUFACTURED FOR:

Albaugh, Inc.  
Ankeny, IA 50021

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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#### STORAGE AND DISPOSAL

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EPA File Symbol 42750-RIG

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS: \_\_\_\_\_

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Albaugh, Inc.  
Ankeny, IA 50021

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**CORPORATE OFFICE**

1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 - Office  
800.247.8013 - Toll Free  
515.964.7813 - Facsimile

# ALBAUGH, INC.

**Valdosta Office**

P.O. Box 2127  
304 Janet Street, Suite H  
Valdosta, GA 31604  
229.244.3288 - Office  
229.244.5841 - Facsimile

FED-X

April 30, 2008

Document Processing Desk  
Mr. Jim Tompkins (PM 25)  
Registration Division  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
One Potomac Yard (South Bldg)  
2777 South Crystal Dr.  
Arlington, VA 22202

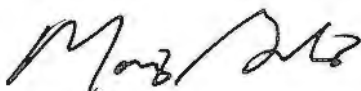
RE: Picloram Acid Technical  
EPA File Symbol 42750-RIG

Dear Mr. Tompkins,

The enclosed submission is updated draft labeling and CSF to reflect changes needed in response to the application transfer from Nufarm America (previous File Symbol 35935-GO).

Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager  
Albaugh, Inc.  
229-244-3288



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS  
[www.albaughinc.com](http://www.albaughinc.com)





United States  
Environmental Protection Agency  
Washington, DC 20460

☒ Registration  
☐ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 42750-RIG	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Picloram Acid Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>4/29/08</u> call _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Response to discussion with Ms. Tobl Colvin-Snyder requesting Albaugh's submission of updated CSF and draft label to reflect changes necessary due to application transfer from another registrant.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	<input type="checkbox"/> Plastic	
		If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 250 Kg.		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Morris Gaskins	Title Registrations Manager	Telephone No. (Include Area Code) 229-244-3280
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Registrations Manager	
4. Typed Name Morris Gaskins	5. Date April 30, 2008	

# PICLORAM ACID TECHNICAL

## For Manufacturing Use Only

**ACTIVE INGREDIENT:**

Picloram: 4-amino-3, 5, 6-trichloropicolinic acid..... 93.0%

**OTHER INGREDIENTS:** ..... 7.0%

**TOTAL:** ..... 100.0%

	<p><b>KEEP OUT OF REACH OF CHILDREN</b></p> <p><b>DANGER - POISON</b></p> <p>SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS</p>	
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For Chemical Spill, Leak, Fire or Exposure, Call CHEMTREC (800) 424-9300  
For Medical Emergencies Only, Call (877) 325-1840

EPA REG. NO. 35935 - 60  
EPA EST. NO.

MANUFACTURED FOR  
NUFARM LIMITED  
RTP, NC 27709



**NET CONTENTS**      Pounds

035935-00000.20070226.  
NUP06094

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
DANGER - POISON**

Fatal if inhaled. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation.

Do not breathe dust. Avoid contact with eyes or clothing. For handling activities, use a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or NIOSH approved respirator with any NPR or HE filter. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

<b>FIRST AID</b>	
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following uses: rangeland and permanent grass pastures; barley, oats and wheat; fallow cropland; Conservation Reserve Program (CRP); forests; non-cropland. Because of their properties and intended uses, herbicidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finishing formulations, and are responsible for obtaining EPA registration of these products.

This technical product can only be used to formulate end-use products which have an EPA approved stewardship program in place.

All other uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration. Uses for experimental purposes that are in compliance with EPA requirements.

**HANDLING PRECAUTIONS**

Do not contaminate water: Do not allow this product to contaminate water used for irrigation, drinking or other domestic purposes. Do not clean containers near water used for these purposes.

Do not contaminate atmosphere: When formulating dry products, do not allow dust particles from this product to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.


**PESTICIDE DISPOSAL:** Open dumping is prohibited. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional office for guidance.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, DC 20460**

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

<b>Date:</b> 5/6/08		<b>EPA Reg. No./File Symbol</b> 42750-RIG		Page 2 of 5	
<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 1525 NE 36th St. Ankeny, IA 50021		<b>Product:</b> <b>PICLORAM ACID TECHNICAL</b>			
<b>Ingredient:</b> Picloram Acid CAS # 1918-02-1					
<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID Number</b>	<b>Submitter</b>	<b>Status</b>	<b>Note</b>
			Nufarm	PER	Not req'd <sup>1</sup>
					In progress <sup>6</sup>
			Nufarm	PER	Not req'd <sup>1</sup>
			Nufarm	PER	
			Albaugh	OWN	
			Nufarm	PER	Not req'd <sup>1</sup>
			Nufarm	PER	
					Waiver <sup>3</sup>
			Nufarm	PER	
			Nufarm	PER	
			Nufarm	PER	
			Nufarm	PER	
					Waiver <sup>4</sup>
					Waiver <sup>4</sup>
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 5/6/08


**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, DC 20460**

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**Ingredient:** Picloram Acid CAS # 1918-02-1

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Nufarm	PER	
					Waiver <sup>5</sup>
			Nufarm	PER	
				PAY	
				PAY	
				PAY	
				PAY	
				PAY	
				PAY	
<b>Signature</b>	 <b>Name and Title:</b> Morris Gaskins Registrations Manager			<b>Date:</b> 5/6/08	

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<b>Ingredient:</b> Picloram Acid CAS # 1918-02-1					
<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID</b>	<b>Submitter (EPA Co. No.)</b>	<b>Status</b>	<b>Note</b>
<b>Picloram generic data requirements</b>					
Albaugh will make offers-to-pay to the following companies that appear on the current data submitters list.					
			Nufarm Americas (228)	PAY	
			Dow Chemical	PAY	
			Reckitt Benckiser (475)	PAY	
			Reckitt Benckiser (777)	PAY	
			BASF Corp. (7969)	PAY	
			Nufarm Ltd. (35935)	PAY	
			BASF Sparks LLC. (51036)	PAY	
			Dow AgroSciences (62719)	PAY	
			SDTF (66607)	PAY	
			United Phosphorous (70506)	PAY	
			Endangered Species TF (73989)	PAY	
			Residential Exposure JV (74888)	PAY	
			Generic Endangered Species TF (84653)	PAY	
<b>Signature</b> 		<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 5/6/08	

Footnotes for PICLORAM ACID TECHNICAL Data Matrix  
(page 5 of 5)

Footnote 1

- 830.6319 Miscibility
- 830.6321 Dielectric Breakdown
- 830.7100 Viscosity

This data is not required for Technical Grade products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

Footnote 2

- 830.6350 Formulation Process

Albaugh requests a waiver for this data requirement. Picloram Acid Technical product is not deliberately formulated. See Guideline 830.1620.

Footnote 3

- 830.7220 Boiling Point/Range

Albaugh requests a waiver for this data requirement. Picloram Acid Technical is a solid.

Footnote 4

- 830.7560 Partition Coefficient, Generator Column Method
- 830.7560 Partition Coefficient, Liquid Chromatography Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7570 Liquid Chromatography Method.

Footnote 5

- 830.7860 Water Solubility, Generator Column Method

Albaugh requests a waiver for these data requirements. Albaugh has elected to satisfy this data with the 830.7840 Shake Flask Method

Footnote 6

- 830.6317 Storage Stability
- 830.6320 Corrosion Characteristics

Studies to generate the required data have been commissioned. Albaugh requests a conditional registration pending submittal of the required data 12 months after study initiation.

## PICLORAM ACID TECHNICAL

For Manufacturing Use Only

### ACTIVE INGREDIENT:

Picloram: 4-amino-3, 5, 6-trichloropyridine-2-carboxylic acid ..... 93.0%

OTHER INGREDIENTS: ..... 7.0%

TOTAL: ..... 100.0%

KEEP OUT OF REACH OF CHILDREN

### WARNING

### FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

HOT LINE NUMBER: Contact CHEMTREC (800) 424-9300 for transport or emergency medical treatment information.

EPA File Symbol 42750-RIG

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS: \_\_\_\_\_

### MANUFACTURED FOR:

Albaugh, Inc.  
Ankeny, IA 50021

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.



Only for formulation into a herbicide for the following uses: rangeland and permanent grass pastures; barley, oats and wheat; fallow cropland; Conservation Reserve Program (CRP); forests; non-cropland. Because of their properties and intended uses, herbicidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finishing formulations, and are responsible for obtaining EPA registration of these products.

This product may be used to formulate products for specific use(s) not listed on the MP label if:

1. The formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).
2. End-use products which have an EPA approved stewardship program in place.

#### HANDLING PRECAUTIONS

Do not contaminate water: Do not allow this product to contaminate water used for irrigation, drinking or other domestic purposes. Do not clean containers near water used for these purposes.

Do not contaminate atmosphere: When formulating dry products, do not allow dust particles from this product to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL: Open dumping is prohibited. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional office for guidance. CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

#### WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

## PICLORAM ACID TECHNICAL

For Manufacturing Use Only

### ACTIVE INGREDIENT:

Picloram: 4-amino-3, 5, 6-trichloropyridine-2-carboxylic acid ..... 93.0%

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TOTAL: ..... 100.0%

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EPA File Symbol 42750-RIG

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS: \_\_\_\_\_

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Albaugh, Inc.  
Ankeny, IA 50021

### PRECAUTIONARY STATEMENTS

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This technical product can only be used to formulate end-use products which have an EPA approved stewardship program in place.

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#### HANDLING PRECAUTIONS

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**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

#### WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS

#### LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

EPA

**Picloram Acid Technical**

For Manufacturing Use Only

1404

**ACTIVE INGREDIENT:**

Picloram: 4-amino-3,5,6-trichloropicolinic acid ..... 95.0%

**OTHER INGREDIENTS:** ..... 5.0%**TOTAL:** ..... 100.0%**KEEP OUT OF REACH OF CHILDREN****WARNING****FIRST AID**

If in eyes:	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
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**HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.

**PRECAUTIONARY STATEMENTS****HAZARDS TO HUMANS AND DOMESTIC ANIMALS****WARNING**

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

EPA Reg. No. 42750-

Manufactured for:  
Albaugh, Inc.  
Ankeny, IA 50021

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

42750-78

MAY 16 2005

EPA Est. No.

NET WEIGHT  
\_\_\_\_\_ Lbs.

**FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE,  
CALL CHEMTREC (800) 424-9300**

No employee or agent of ALBAUGH, INC. or the Seller is authorized to vary or exceed the terms of this Warranty in any other manner.

**DISCLAIMER AND INDEMNITY FOR FORMULATORS' USES**

The manufacturer expressly disclaims all liability for claims and actions (whether based on contract, tort, strict liability, or breach of warranty) arising out of, resulting from or connected with a formulation containing this product when used for any purpose other than those uses set forth in the Directions for Use. The manufacturer has not developed scientific data to support, nor has it explicitly or implicitly approved, any uses other than those in the Directions for Use.

Any formulator or buyer who uses this product in formulations for any other than those stated in the Directions for Use above assumes all liability for claims and actions arising out of, connected with or resulting from such use and agrees by so using this product to indemnify and hold harmless the manufacturer from such claims and actions.

This Disclaimer and Indemnity is in addition to, not in lieu of, the above Conditions of Sale and Warranty.



## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**Only for formulation into a herbicide for the following uses:** barley, oats and wheat; fallow cropland; rangeland and permanent grass pastures; Conservation Reserve Program (CRP); forests; noncropland.

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

## STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a cool, dry area. Open dumping is prohibited.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

## CONDITIONS OF SALE AND WARRANTY

The **DIRECTIONS FOR USE** of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of ALBAUGH, INC. or the Seller. All such risks shall be assumed by the Buyer.

ALBAUGH, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. **ALBAUGH, INC. MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS FOR ANY PARTICULAR PURPOSE OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS.**

**BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED.** When Buyer suffers losses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict liability, or other legal theories), Buyer must promptly notify Seller in writing of any claims to be eligible to receive either remedy stated above. **IN NO CASE SHALL ALBAUGH, INC. OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.** ALBAUGH, INC. and the Seller offer this product, and the Buyer accepts it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of ALBAUGH, INC.

## PICLORAM ACID TECHNICAL

For Manufacturing Use Only

### ACTIVE INGREDIENT:

Picloram: 4-amino-3, 5, 6-trichloropyridine-2-carboxylic acid ..... 93.0%

OTHER INGREDIENTS: ..... 7.0%

TOTAL: ..... 100.0%

KEEP OUT OF REACH OF CHILDREN

### WARNING

### FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

HOT LINE NUMBER: Contact CHEMTREC (800) 424-9300 for transport or emergency medical treatment information.

EPA File Symbol 42750-RIG

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS: \_\_\_\_\_

### MANUFACTURED FOR:

Albaugh, Inc.  
Ankeny, IA 50021

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following uses: rangeland and permanent grass pastures; barley, oats and wheat; fallow cropland; Conservation Reserve Program (CRP); forests; non-cropland. Because of their properties and intended uses, herbicidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finishing formulations, and are responsible for obtaining EPA registration of these products.

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#### HANDLING PRECAUTIONS

Do not contaminate water: Do not allow this product to contaminate water used for irrigation, drinking or other domestic purposes. Do not clean containers near water used for these purposes.

Do not contaminate atmosphere: When formulating dry products, do not allow dust particles from this product to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE DISPOSAL:** Open dumping is prohibited. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional office for guidance.

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## PICLORAM ACID TECHNICAL

For Manufacturing Use Only

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**CORPORATE OFFICE**

1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 - Office  
800.247.8013 - Toll Free  
515.964.7813 - Facsimile

# ALBAUGH, INC.

**Valdosta Office**

P.O. Box 2127  
304 Janet Street, Suite H  
Valdosta, GA 31604  
229.244.3288 - Office  
229.244.5841 - Facsimile

FED-X

April 30, 2008

Document Processing Desk  
Mr. Jim Tompkins (PM 25)  
Registration Division  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
One Potomac Yard (South Bldg)  
2777 South Crystal Dr.  
Arlington, VA 22202

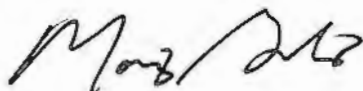
RE: Picloram Acid Technical  
EPA File Symbol 42750-RIG

Dear Mr. Tompkins,

The enclosed submission is updated draft labeling and CSF to reflect changes needed in response to the application transfer from Nufarm America (previous File Symbol 35935-GO).

Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager  
Albaugh, Inc.  
229-244-3288

**Agri Star**™  
By Albaugh, Inc.

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[www.albaughinc.com](http://www.albaughinc.com)



United States  
Environmental Protection Agency  
Washington, DC 20460

☒ Registration  
☐ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 42750-RIG	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Picloram Acid Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>4/29/08 call</u>	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Response to discussion with Ms. Tobi Colvin-Snyder requesting Albaugh's submission of updated CSF and draft label to reflect changes necessary due to application transfer from another registrant.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 250 Kg.		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Morris Gaskins		Title Registrations Manager		Telephone No. (Include Area Code) 229-244-3280	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Registrations Manager			
4. Typed Name Morris Gaskins		5. Date April 30, 2008			

# PICLORAM ACID TECHNICAL

## For Manufacturing Use Only

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Picloram: 4-amino-3, 5, 6-trichloropicolinic acid..... 93.0%

**OTHER INGREDIENTS:** ..... 7.0%

**TOTAL:** ..... 100.0%



**KEEP OUT OF REACH OF CHILDREN  
DANGER - POISON**



SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire or Exposure, Call CHEMTREC (800) 424-9300  
For Medical Emergencies Only, Call (877) 325-1840

EPA REG. NO. 35935 - 60  
EPA EST. NO.

MANUFACTURED FOR  
NUFARM LIMITED  
RTP, NC 27709



**NET CONTENTS**      Pounds

035935-00000.20070226.  
NUP06094

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
DANGER - POISON**

Fatal if inhaled. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation.

Do not breathe dust. Avoid contact with eyes or clothing. For handling activities, use a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or NIOSH approved respirator with any NPR or HE filter. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

<b>FIRST AID</b>	
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p style="text-align: center;"><b>HOT LINE NUMBER</b></p> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.</p>	

**ENVIRONMENTAL HAZARDS**

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If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(RV022607)



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TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

## PICLORAM ACID TECHNICAL

For Manufacturing Use Only

### ACTIVE INGREDIENT:

Picloram: 4-amino-3, 5, 6-trichloropyridine-2-carboxylic acid ..... 93.0%

OTHER INGREDIENTS: ..... 7.0%

TOTAL: ..... 100.0%

KEEP OUT OF REACH OF CHILDREN

### WARNING

### FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

HOT LINE NUMBER: Contact CHEMTREC (800) 424-9300 for transport or emergency medical treatment information.

EPA File Symbol 42750-RIG

EPA Est. No. xxxxxx-xxx-xxx

NET CONTENTS: \_\_\_\_\_

### MANUFACTURED FOR:

Albaugh, Inc.  
Ankeny, IA 50021

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following uses: rangeland and permanent grass pastures; barley, oats and wheat; fallow cropland; Conservation Reserve Program (CRP); forests; non-cropland. Because of their properties and intended uses, herbicidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finishing formulations, and are responsible for obtaining EPA registration of these products.

This technical product can only be used to formulate end-use products which have an EPA approved stewardship program in place.

All other uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration. Uses for experimental purposes that are in compliance with EPA requirements.

#### HANDLING PRECAUTIONS

Do not contaminate water: Do not allow this product to contaminate water used for irrigation, drinking or other domestic purposes. Do not clean containers near water used for these purposes.

Do not contaminate atmosphere: When formulating dry products, do not allow dust particles from this product to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE DISPOSAL:** Open dumping is prohibited. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional office for guidance.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

#### WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS

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Recommendation of Division Directors Negotiated Due Dates		
Decision#: 376842	Registration#: 35935-GO	Petition #: NA
Fee Category: R31	PRIA Decision Time Frame: 6 months	
Submitted by: Tobi Colvin-Snyder	Branch: HB	Date:
Company: Nufarm		
Original Due Date: October 2, 2007	Proposed New Due Date: February 18, 2008	
Previous Negotiated Due Dates: None		
Is the "Fix" in-house? No	If not, date "Fix" expected: February 4, 2008	
<p><b>Issue (describe in detail):</b></p> <p>Changes must be made to the product label and csf to resolve the following:</p> <ul style="list-style-type: none"> <li>• The nominal concentration of the active ingredient stated on the csf does not agree with that on the proposed label;</li> <li>• The chemical name of the active ingredient listed on the csf and the proposed label differ and must be stated the same way on the csf and the label;</li> <li>• The pH must be stated on the csf.</li> </ul> <p>We still have not received a revised csf and label.</p>		
<p><b>Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates):</b></p> <p>On August 30, 2007, Tobi Colvin-Snyder called the registrant to inform him that changes would be needed to the label and csf, and e-mailed the product chemistry review that specified in detail the changes that are needed. The registrant was called by phone again on September 9. On both August 30 and September 9, the registrant indicated that the revised label and csf would be submitted prior to the due date. On September 24, the registrant was phoned again, reminded of the October 2 due date, and asked when he would submit the revised label and csf. The registrant replied "close to the due date", and was informed that time needed to be allowed for Agency review. The registrant phoned on September 25 and asked for an extension of the PRIA due date. After further discussion with EPA the registrant determined that they expect to be able to submit the revised csf and label by December 4, and they requested a renegotiated due date of December 17, 2007.</p> <p>The registrant did not submit the revised label on December 4 as they had agreed. The Agency tried to contact them repeatedly, but was unsuccessful. When they finally responded on December 7, the registrant stated that he is "95% sure" that the product will be transferred to another company, and he still doesn't know when the transfer will happen. He is unwilling to submit the revised label and csf until after the transfer takes place. He agreed to a renegotiated due date of February 18, 2008, and stated that he will submit the revised label and csf no later than February 4, 2008.</p>		

October 26, 2006

**Rationale for Proposed Due Date:**

The registrant needs to resolve internal business-related issues before sending in the revised label and csf.

**Other Comments:****Approve:****Disapprove:****If disapproved, action to be taken:****OD or DOD Signature:****Date:**



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Decision#: 376842	Registration#: 35935-GO	Petition #: NA
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October 26, 2006

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**Other Comments:****Approve:****Disapprove:****If disapproved, action to be taken:****OD or DOD Signature:****Date:**

Tobi  
Colvin-Snyder/DC/USEPA/US

To George.Meindl@us.nufarm.com

cc

08/30/2007 03:27 PM

bcc

Subject 35935-GO

Hi George,

Here are the reviews; I received the tox review. Jim instructed me not to e-mail the confidential appendix on the chemistry review.

This is the product that needed changes to the label and csf. You'll need to address items 6(a), 6(b), and 6(c) before we can proceed with registration. Items 3(a) and 4(b) can be imposed on the registration notice.

Tobi

----- Forwarded by Tobi Colvin-Snyder/DC/USEPA/US on 08/30/2007 03:24 PM -----



134.67.221.153@mintra01.rtp

.epa.gov

08/30/2007 03:01 PM

To Tobi Colvin-Snyder/DC/USEPA/US@EPA

cc

Subject Scan From MFP

DOT NOT REPLY TO THIS MESSAGE



scan.pdf



Tobi  
Colvin-Snyder/DC/USEPA/US

To Tobi Colvin-Snyder/DC/USEPA/US@EPA

cc

09/10/2007 03:23 PM

bcc

Subject 35935-GO - Note to file

I spoke with George Mindl today, and am waiting for him to submit revised labeling (in accord with the cited product 42750-78), submit the UV spectrum study, and submit a revised csf with the pH filled in.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Mr. George Meindl  
Nufarm Americas, Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527

RE: Application for Registration dated March 14, 2007  
Product Name: Picloram Acid Technical  
EPA File Symbol: 35935-GO

Dear Mr. Meindl:

Our records indicate that the decision review period for EPA to make a determination pursuant to the Pesticide Registration Improvement Act (PRIA) regarding the above referenced application ends on October 2, 2007. The Agency has reviewed the application. On August 30, 2007, the Agency informed you that the application was inadequate and described the deficiencies to be addressed. As specified in the product chemistry review that was e-mailed to you on August 30, the product label and confidential statement of formula (csf) conflict, and changes must be made so that they are in agreement. In addition, the pH value stated in the product chemistry study needs to be added to the csf. The Agency contacted you again on September 9, September 24, and September 25 to discuss the need for a correctly revised label and csf prior to granting registration of this proposed new technical product. We still have not received a revised csf and label.

The Agency, in meeting its obligation to make a determination within the PRIA decision review period, has determined that your application does not meet the standard for registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and, therefore, cannot be granted at this time.

The application's deficiencies include:

- The nominal concentration of the active ingredient stated on the csf does not agree with that on the proposed label;
- The chemical name of the active ingredient listed on the csf and the proposed label differ and must be stated the same way on the csf and the label;
- The pH must be stated on the csf.

Although this concludes EPA's PRIA review of your application, this determination is not a denial of your application pursuant to section 3(c)(6) of FIFRA. Pursuant to 40 CFR § 152.105, you

have 75 days to address the deficiencies or notify the Agency when the information will be submitted to address the deficiencies. You have the following four options.

1. **Resolve the issue(s).** You may resolve the issue(s) identified in [this letter or date of past deficiency letter] by submitting the information/data/studies by December 9, 2007 or an explanation of why it will take longer to correct the deficiency or deficiencies, including your written commitment and schedule to respond to the deficiencies. The Agency will then continue to diligently work with you in resolving the deficiencies without a PRIA decision due date. Absent unanticipated issues raised by your response to the issues in the deficiency letter, it is the Agency's expectation that resolution of the deficiencies will result in the granting of your application

2. **Do nothing.** If you do not respond to this letter, the Agency will administratively withdraw your application on December 9, 2007. Since a fee was paid, the Agency will provide any applicable refund as soon as practicable. Once the application is withdrawn, if you decide to pursue this action again, you will need to submit a new application, including either the appropriate fee or request for a fee waiver (or both, if the fee waiver request is for a 50% fee waiver).

3. **Withdraw the application.** You may withdraw your application. Since a fee was paid, the Agency will provide any applicable refund as soon as practicable. Once the application is withdrawn, if you decide to pursue this action again, you will need to submit a new application, including either the appropriate fee or request for a fee waiver (or both, if the fee waiver request is for a 50% fee waiver).

4. **Request a denial.** Because this determination is not a denial under section 3(c)(6) of FIFRA, you may request that EPA issue such a denial by responding to the Agency prior to December 9, 2007. The Agency may then initiate a denial process, based upon the record before the Agency as of the date of this letter, as described in section 3(c)(6) of FIFRA and 40 CFR § 152.118. The process includes publication of a notice of denial in the Federal Register and a possible public hearing.

If you have questions concerning or a response to this letter, please contact Jim Tompkins by telephone at 703-305-5697 or by e-mail at [tompkins.jim@epa.gov](mailto:tompkins.jim@epa.gov).

Sincerely,

Debra Edwards, Ph. D.,  
Director, Office of Pesticide Programs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

September 24, 2007

Mr. George Meindl  
Nufarm Americas, Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527

Subject: Submission of a new product registration for Picloram Acid Technical  
EPA File Symbol: 35935-GO  
Date of Submission: March 15, 2007

Dear Mr. Meindl:

Pursuant to 40 CFR §152.105, the subject application has been determined insufficient, and can not be processed at this time. In order to further review this application, the following changes to the product label and product confidential statement of formula, which were specified in Tobi Colvin-Snyder's e-mail message to you sent on August 30, 2007, must be completed and submitted to the Agency:

The proposed basic CSF dated 14/MAR/2007, was filled out correctly and completely, however, the nominal concentration does not agree with that on the proposed label (refer to finding 5b). The upper and lower certified limits of the ingredients are within the standard limits of 40CFR§158.175(b)(2). All ingredients claimed on the CSF are cleared for use in pesticide formulations intended for food uses.

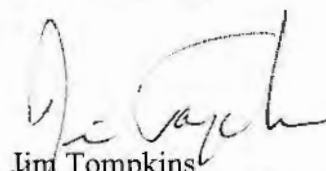
There should be consistency between the label and CSF in listing the ingredient statement, listed as 4-amino-3,5,6-trichloropicolinic acid on the label and as 4-amino-3,5,6-trichloropyridine-2-carboxylic acid on the CSF.

The applicant should be advised to complete box 8 of the CSF by indicating the pH value at 2.87 cited in the experimental data in MRID #471219-01.

- ❖ If, after 75 days (December 8, 2007), you do not respond, or you subsequently fail to complete the application within the time scheduled for completion as noted below, the Agency will terminate any action on this application and will treat the application as if it has been withdrawn by the applicant. Any subsequent submission relating to this application must be submitted as a new application. Upon receipt of the revised information, EPA may require a renegotiated PRIA due date that will allow the Agency sufficient time to complete the review process for this product.

If you have further questions, please contact me. My business information is sited below for your use.

Sincere regards,



Jim Tompkins  
Product Manager 25  
Herbicide Branch  
Registration Division (7505P)

Phone: 703 305 5697

Fax: 703 308 0029

E-mail: [Tompkins.jim@epa.gov](mailto:Tompkins.jim@epa.gov)

# DATA PACKAGE BEAN SHEET

Date: 25-May-2007

Page 1 of 2

Decision #: 376842

DP #: (340078)

PRIA

Parent DP#:

## \*\*\* Registration Information \*\*\*

Registration: 35935-GO - PICLORAM ACID TECHNICAL

Company: 35935 - NUFARM LIMITED

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# PY1 S-7337

Risk Manager Reviewer: Tobj Colvin-Snyder TSNYDER

Sent Date: 03-May-2007

Calculated Due Date: 02-Oct-2007

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (R31) NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMIST

Ingredients: 005101, Picloram(93%)

R31  
#5/8/7

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 25-May-2007

Due Back: \_\_\_\_\_

DP Ingredient: 005101, Picloram

DP Title: Product Chemistry Review

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: \_\_\_\_\_

### Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 02-Sep-2007 ✓

Team Name: Chem

Science Due Date: \_\_\_\_\_

Reviewer Name: Sami Mahab

8/1/07

8/14/07

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

Printed on Page 2

## \*\*\* Additional Data Package for this Decision \*\*\*

No Additional Data Packages

## \*\*\* Data Package Instructions \*\*\*

Please review the attached csfs (for both the proposed and cited product) and the attached studies (MRIDs 47080701-02 and 47121901). Please let me know if the information satisfies product chemistry requirements for registration of this product, and also whether this product is substantially similar to the cited product for the purpose of using generic data to support registration of this product.

Let me know if you need additional information.

Thanks.

Tobj

MRID	MRID Status	Citation Reference	Guideline
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1550/Product Identity and composition
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1600/Description of materials used to produce the product
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1620/Description of production process
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1670/Discussion of formation of impurities
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1750/Certified limits
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1800/Enforcement analytical method
47080702		Westmoreland, D. (2007) Picloram Technical Acid, NUP-06094: Preliminary Analysis. Project Number: RTP/07/012/REG, 0329/030/052/03. Unpublished study prepared by Nufarm Limited. 241 p.	830.1700/Preliminary analysis
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.6302/Color
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.6303/Physical state
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.6304/Odor
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.6313/Stability to sunlight, normal and elevated temperatures, metals, and metal ions
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7000/pH of water solutions or suspensions
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7200/Melting point/melting range
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7300/Density/relative density
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7370/Dissociation constant in water
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7550/Partition coefficient (n-octanol/water), shake flask method
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7840/Water solubility: Column elution method, shake flask method
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7950/Vapor pressure

# ROUTING AND TRANSMITTAL SLIP

Date

10-9-07

TO: (Name, office symbol, room number,  
building, Agency/Post)

	Initials	Date
1. Jim Tompkins	DK FORT	10/9
2. Dan Kenny	DK	10/9
3. <del>Yvonne Napoleon</del>		
4. Lois Rossi (DON STUBBS)	DRS	10/10
5. Marty Monnel MONELL	MM	10-1
6. Tobi Colvin-Snyder		
7.		
8.		
9.		
10.		

<input type="checkbox"/> Action	<input type="checkbox"/> File	<input type="checkbox"/> Note and Return
<input type="checkbox"/> Approval	<input type="checkbox"/> For Clearance	<input type="checkbox"/> Per Conversation
<input type="checkbox"/> As Requested	<input type="checkbox"/> For Correction	<input type="checkbox"/> Prepare Reply
<input type="checkbox"/> Circulate	<input type="checkbox"/> For Your Information	<input type="checkbox"/> See Me
<input type="checkbox"/> Comment	<input type="checkbox"/> Investigate	<input checked="" type="checkbox"/> Signature
<input type="checkbox"/> Coordination	<input type="checkbox"/> Justify	

REMARKS

FR I A due date October 2

DO NOT use this form as a RECORD of approvals, concurrences, disposals,  
clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No. - Bldg.

Phone No.  
(703) 305-7801

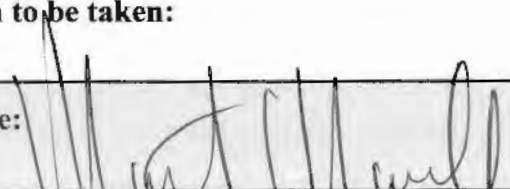
Tobi Colvin-Snyder

OPTIONAL FORM 41 (Rev. 1-94)  
Prescribed by GSA



Recommendation of Division Directors Negotiated Due Dates		
Decision#: 376842	Registration#: 35935-GO	Petition #: NA
Fee Category: R31	PRIA Decision Time Frame: 6 months	
Submitted by: Tobi Colvin-Snyder	Branch: HB	Date:
Company: Nufarm		
Original Due Date: October 2, 2007	Proposed New Due Date: December 17, 2007	
Previous Negotiated Due Dates: None		
Is the "Fix" in-house? No	If not, date "Fix" expected: December 4, 2007	
<p><b>Issue (describe in detail):</b></p> <p>Changes must be made to the product label and csf to resolve the following:</p> <ul style="list-style-type: none"> <li>• The nominal concentration of the active ingredient stated on the csf does not agree with that on the proposed label;</li> <li>• The chemical name of the active ingredient listed on the csf and the proposed label differ and must be stated the same way on the csf and the label;</li> <li>• The pH must be stated on the csf.</li> </ul> <p>We still have not received a revised csf and label.</p>		
<p><b>Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates):</b></p> <p>On August 30, 2007, Tobi Colvin-Snyder called the registrant to inform him that changes would be needed to the label and csf, and e-mailed the product chemistry review that specified in detail the changes that are needed. The registrant was called by phone again on September 9. On both August 30 and September 9, the registrant indicated that the revised label and csf would be submitted prior to the due date. On September 24, the registrant was phoned again, reminded of the October 2 due date, and asked when he would submit the revised label and csf. The registrant replied "close to the due date", and was informed that time needed to be allowed for Agency review. The registrant phoned on September 25 and asked for an extension of the PRIA due date. After further discussion with EPA the registrant determined that they expect to be able to submit the revised csf and label by December 4, and they requested a renegotiated due date of December 17, 2007.</p>		
<p><b>Rationale for Proposed Due Date:</b></p> <p>The registrant needs to resolve internal business-related issues before sending in the revised label and csf.</p>		

October 26, 2006

Other Comments:	
Approve: <input checked="" type="checkbox"/>	Disapprove:
If disapproved, action to be taken:	
OD or DOD Signature: 	Date: 10-1-07



George.Meindl@us.nufarm.co  
m  
10/05/2007 03:02 PM

To Tobin Colvin-Snyder/DC/USEPA/US@EPA  
cc  
bcc  
Subject Re: 35935-GO

Hi Tobin -

In regard to the pending registration EPA file symbol 35935-GO, we should have the deficiencies previously discussed to you within 60 days from now. We understand that you will need time to review and process this information. Therefore we agree to re-negotiate the PRIA due date to December 17, 2007.

Let me know if you have any further questions.

Thank you,

George Meindl  
Registration Manager  
Nufarm Americas Inc.  
150 Harvester Drive Suite 200  
Burr Ridge, IL 60527  
phone 630.455.2000 (main)  
phone 630.455.2017 (direct)  
fax 630.455.2030 (regulatory dept.)  
email george.meindl@us.nufarm.com

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Colvin-Snyder.Tob  
i@epamail.epa.gov

09/21/2007 03:14  
PM

George.Meindl@us.nufarm.com

To

cc

Subject

35935-GO

George,

The PRIA due date is October 2.

Tobi



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**TECHNICAL REVIEW BRANCH  
SIMILARITY CLINIC DETERMINATION**

21/AUG/2007

MEMORANDUM

Subject: Name of Pesticide Product: Picloram Acid Technical  
EPA Reg. No. /File Symbol: 35935-GO  
DP Barcode: D340079  
Decision No: 376842  
PC Code: 005101  
Action Code: R31

From: Eugenia McAndrew, Biologist  
Technical Review Branch  
Registration Division (7505P)

*E. McAndrew*  
*OPD:AK*

To: Tobi Colvin-Snyder, RM Team 25  
Herbicide Branch  
Registration Division (7505P)

Applicant: Nufarm Limited  
150 Harvester Drive, suite 200  
Burr Ridge, IL 60527

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Picloram: 4-amino-3, 5, 6-trichloropicolinic acid	83.0
<u>Inert Ingredient(s):</u>	<u>7.0</u>
Total:	100.0%

**ACTION REQUESTED:** Similarity action is requested between the proposed product, Picloram Acid Technical, EPA File Symbol 35935-GO, and the cited product, Picloram Acid Technical, EPA Reg. No. 62719-78.

**BACKGROUND:** Nufarm Limited has applied for registration of Picloram Acid Technical, EPA File Symbol 35935-GO, claiming similarity to Picloram Acid Technical, EPA Reg. No. 62719-78. Both products are technical grade for manufacturing use only. The Registrant is using the cite-all method of data support to satisfy the acute toxicity data requirements.

**RECOMMENDATIONS:** TRB has evaluated the CSFs of the proposed product, 35935-GO, and the cited product, 62719-78, and has determined that the two products are substantially similar. However, there are considerable differences in the labeling of the proposed and cited products. The label submitted for the proposed product has a signal word of DANGER with precautionary labeling for a toxicity category of 1 based on the inhalation route of exposure. If the Registrant has additional data or information regarding the inhalation toxicity of the proposed product, the Registrant should submit it to the Agency. It is possible that the proposed label is based on the information in the August 1995 Picloram Reregistration Eligibility Document (RED). At that time, the inhalation LC<sub>50</sub> was given as 0.035 mg/L and it may be that the picloram had not been tested at a higher concentration as of that date.

The proposed basic CSF dated March 14, 2007 was reviewed by the TRB Product Chemistry Team (Malak; D340078; 15/AUG/2007). The review states that the CSF will be accepted after deficiencies are resolved.

This memorandum pertains only to the decision concerning whether the subject product is similar to the cited product from an acute toxicological view point. For the purposes of this action, TRB has made no determination of the adequacy of the toxicological data base or the precautionary label of the cited product.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**TECHNICAL REVIEW BRANCH  
SIMILARITY CLINIC DETERMINATION**

21/AUG/2007

**MEMORANDUM**

Subject: Name of Pesticide Product: Picloram Acid Technical  
EPA Reg. No. /File Symbol: 35935-GO  
DP Barcode: D340079  
Decision No: 376842  
PC Code: 005101  
Action Code: R31

From: Eugenia McAndrew, Biologist *E. McAndrew*  
Technical Review Branch  
Registration Division (7505P) *OD: JH*

To: Tobi Colvin-Snyder, RM Team 25  
Herbicide Branch  
Registration Division (7505P)

Applicant: Nufarm Limited  
150 Harvester Drive, suite 200  
Burr Ridge, IL 60527

**FORMULATION FROM LABEL:**

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Picloram: 4-amino-3, 5, 6-trichloropicolinic acid	83.0
<u>Inert Ingredient(s):</u>	<u>7.0</u>
Total:	100.0%

**ACTION REQUESTED:** Similarity action is requested between the proposed product, Picloram Acid Technical, EPA File Symbol 35935-GO, and the cited product, Picloram Acid Technical, EPA Reg. No. 62719-78.



George.Meindl@us.nufarm.co  
m  
08/27/2007 09:48 AM

To Tobi Colvin-Snyder/DC/USEPA/US@EPA  
cc  
bcc  
Subject Fw: EPA file symbol 35935-GO - Picloram Acid Technical

Hi Tobi - I'm looking for a status report on 35935-GO. I'm wondering if the product chemistry review has been completed - any issues with the submission so far (one way or the other)?

Thank you,

George Meindl  
Registration Manager  
Nufarm Americas Inc.  
150 Harvester Drive Suite 200  
Burr Ridge, IL 60527  
phone 630.455.2000 (main)  
phone 630.455.2017 (direct)  
fax 630.455.2030 (regulatory dept.)  
email george.meindl@us.nufarm.com

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----- Forwarded by George Meindl/US/Nufarm on 08/27/2007 08:48 AM -----

George  
Meindl/US/Nufarm

05/25/2007 11:00  
AM

To  
Colvin-Snyder.Tobi@epamail.epa.gov  
cc

Subject  
re: EPA file symbol 35935-GO -  
Picloram Acid Technical

Dear Tobi - as we just discussed, instead of considering our pending registration substantially similar to EPA Reg. No. 62719-179 please change it to being substantially similar to EPA Reg. No. 42750-78



Thank you for your help on this matter and let me know if you have any further questions.

George Meindl  
Registration Manager  
Nufarm Americas Inc.  
150 Harvester Drive Suite 200  
Burr Ridge, IL 60527  
phone 630.455.2000 (main)  
phone 630.455.2017 (direct)  
fax 630.455.2030 (regulatory dept.)  
email george.meindl@us.nufarm.com

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DATE OUT: 14/AUG/2007

FEE

FEE: PRODUCT CHEMISTRY REVIEW OF: A TECHNICAL GRADE TGAI [X]  
DP BARCODE: D340078 RECEIVED DATE: 25/MAY/2007 FILE SYMBOL#: 35935-GO  
PRODUCT NAME: Picloram Acid Technical MRIDs 470807-01 to 02 & 471219-01  
COMPANY NAME: Nufarm Limited FOOD USES [X] ACTION CODE: R31  
PPC NUMBER OF THIS TGAI: 005101 DECISION NO.: 376842

FROM: Sami Malak, Chemist *Sami Malak*  
Technical Review Branch/RD (7505P) *SBM 8/15/07*

TO: 25 James Tompkins/Tobi-Colvin Snyder  
Herbicide Branch/RD (7505P)

**INTRODUCTION:**

The Herbicide Branch requested TRB to review this application for a "me-too" registration of subject product. The applicant is claiming its similarity to Picloram Acid Technical, Reg. No. 42750-78. In support of this application, the applicant included product chemistry data, a proposed basic CSF dated 14/MAR/2007, label EPA received on 15/MAR/2007, Certificate With Respect to Citation of Data, and Data Matrix.

**FINDINGS:**

1. The subject product is a new TGAI produced for the applicant by [REDACTED] Picloram technical, CAS #1918-02-1, is 93% pure in the form of 4-amino-3,5,6-trichloropicolinic acid.
2. The subject product is substantially similar in composition and labeling to Picloram Acid Technical, Reg. No. 42750-78. The nominal concentration of the pending product falls between the standard upper and lower certified limits of the registered product, calculated by this reviewer at 97.85/92.15% (95%  $x \pm 0.03\%$ ).
3. The subject product, a Herbicide, will be used to formulate end-use products intended for weed control in crop areas.
  - 3a. The applicant should be advised to submit product chemistry data pertaining to product's storage stability, corrosion characteristics, and UV/Visible absorption data requirement of GRNs 830.6317, 830.6320, and 830.7050, respectively.
  - 3b. Except for the data gap in Finding 3(a) above, the submitted data is adequate and support a "me-too" registration of subject product.
  - 4a. Adequate analytical method is available for enforcement. The method was previously submitted and reviewed in connection with registration of the registered product, picloram acid technical, Reg. No. 42750-78. A HPLC

analytical method was included with this submission, MRIDs #470807-01 & 470807-02. The method, entitled "Determination of Test Substance Purity, Analytical Procedure" was also used in the preliminary analysis. The method is reviewed in this memorandum.

- 4b. The applicant should be advised to submit the proposed analytical method and samples to the EPA's laboratory for validation (refer to Finding 4a above).
5. The label claim nominal concentrations of 93% picloram technical acid is consistent with that in the basic CSF dated 14/MAR/2007. Further, the storage and disposal statement and the physical or chemical hazards statement are in compliance with the regulations of 40CFR§156.78.
- 6a. The proposed basic CSF dated 14/MAR/2007, was filled out correctly and completely, however, the nominal concentration does not agree with that on the proposed label (refer to finding 5b). The upper and lower certified limits of the ingredients are within the standard limits of 40CFR§158.175(b)(2). All ingredients claimed on the CSF are cleared for use in pesticide formulations intended for food uses.
- 6b. There should be consistency between the label and CSF in listing the ingredient statement, listed as 4-amino-3,5,6-trichloropicolinic acid on the label and as 4-amino-3,5,6-trichloropyridine-2-carboxylic acid on the CSF.
- 6c. The applicant should be advised to complete box 8 of the CSF by indicating the pH value at 2.87 cited in the experimental data in MRID #471219-01.

### **CONCLUSIONS:**

1. From the product chemistry point of view, the pending product is substantially similar in composition and labeling to Picloram Acid Technical, Reg. No. 42750-78 (Finding 2 above).
2. After resolving Findings 3(a), 4(b), 6(b), and 6(c) above, the TRB will have no objections for a "me-too" registration of subject product. The proposed basic CSF dated 14/MAR/2007 and label EPA received on 15/MAR/2007 will be accepted after resolving the deficiencies.

### **VIEW OF PRODUCT CHEMISTRY DATA:**

1. A statement of data confidentiality dated 13/MAR/2007 was included with this submission claiming confidentiality of some of the submitted data on the basis of its falling within the scope of FIFRA§10(d)(1)(A), (B), or (C). Review of CBI data was moved to Confidential appendix A.
2. A GLP Statement dated 01/MAY/2006 was included with this submission to the

**BACKGROUND:** Nufarm Limited has applied for registration of Picloram Acid Technical, EPA File Symbol 35935-GO, claiming similarity to Picloram Acid Technical, EPA Reg. No. 62719-78. Both products are technical grade for manufacturing use only. The Registrant is using the cite-all method of data support to satisfy the acute toxicity data requirements.

**RECOMMENDATIONS:** TRB has evaluated the CSFs of the proposed product, 35935-GO, and the cited product, 62719-78, and has determined that the two products are substantially similar. However, there are considerable differences in the labeling of the proposed and cited products. The label submitted for the proposed product has a signal word of DANGER with precautionary labeling for a toxicity category of 1 based on the inhalation route of exposure. If the Registrant has additional data or information regarding the inhalation toxicity of the proposed product, the Registrant should submit it to the Agency. It is possible that the proposed label is based on the information in the August 1995 Picloram Reregistration Eligibility Document (RED). At that time, the inhalation LC<sub>50</sub> was given as 0.035 mg/L and it may be that the picloram had not been tested at a higher concentration as of that date.

The proposed basic CSF dated March 14, 2007 was reviewed by the TRB Product Chemistry Team (Malak; D340078; 15/AUG/2007). The review states that the CSF will be accepted after deficiencies are resolved.

This memorandum pertains only to the decision concerning whether the subject product is similar to the cited product from an acute toxicological view point. For the purposes of this action, TRB has made no determination of the adequacy of the toxicological data base or the precautionary label of the cited product.

effect that some of the submitted studies were conducted in compliance with the GLP requirements of 40CFR§160 and the Laboratory Practices of OECD, revised in 1997.

Chemical Name (CAS, IUPAC, ANSI, etc.)	4-amino-3,5,6-trichloropyridine-2-carboxylic acid
Chemical Numbers (CAS; PC Code)	Reg. No. 35935-GO CAS No. 1918-02-1 PC Code 005101
Registration/Symbol No.	35935-GO
Type of Product (T, FI, MP, EP)	93% T
DP Barcode	D340078
Reviewer	Sami Malak, Ph.D.

The applicant has submitted the following MRID of product chemistry data:

Table 1: Manufacturing and Impurity Data for picloram acid technical: 4-amino-3,5,6-trichloropyridine-2-carboxylic acid				
GRN	Requirement	MRID	Status <sup>1</sup>	Details and/or Deficiency <sup>2</sup>
830.1550	Product Identity & Disclosure of Ingredients	470807-01	A	For product identity refer to text below. For product's composition refer to Confidential Appendix A for details.
830.1600 830.1620	Starting Materials & Manufacturing Process	470807-01	A	Refer to Confidential Appendix A for details.
830.1670	Discussion of Impurities	470807-01	A	Refer to Confidential Appendix A for details.
830.1700	Preliminary Analysis	470807-01 470807-02	A	Refer to Confidential Appendix A for details.
830.1750	Certification of Limits	470807-01	A	Refer to Confidential Appendix A for details.
830.1800	Analytical Methods	470807-01 470807-02	A	Refer to text for details
<sup>1</sup> A = Acceptable; N = Unacceptable (see Deficiency); N/A = Not Applicable. <sup>2</sup> Refer to CBI Appendix A for details.				

**Group A, Series 830-Product Identity, Composition, and Analysis (40 CFR 155, 160, 162, 167, 175 & 180)**

**830-1550 Product Identity and Composition**

The subject product is a new TGAI produced for the applicant by [REDACTED]  
[REDACTED] Picloram technical,  
CAS #1918-02-1, is 93% pure.

Chemical name: 4-amino-3,5,6-trichloropyridine-2-carboxylic acid

Common Name: Picloram

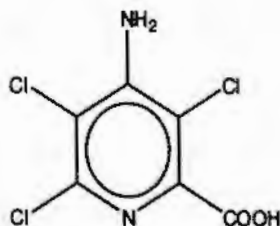
CAS #: 1918-02-1

Product category: Herbicide

Molecular Formula:  $C_6H_3Cl_3N_2O_2$

Molecular Weight: 241.5 g/mol

Molecular Structure:



**830-1600 Description of Materials Used to Produce the Product:**

Refer to Confidential appendix A.

**830-1620 Description of Production Process:**

Refer to Confidential appendix A.

**830-1620 Discussion of Formation of Impurities:**

Refer to Confidential appendix A.

**830-1700 Preliminary Analysis:**

Refer to Confidential appendix A.

**830-1750 Certified Limits:**

Refer to Confidential appendix A.

830-1800 Enforcement Analytical Method:

Adequate analytical method is available for enforcement. The method was previously submitted and reviewed in connection with registration of the registered product, picloram acid technical, Reg. No. 42750-78. A HPLC analytical method was included with this submission, MRIDs #470807-01 & 470807-02. The method, entitled "Determination of Test Substance Purity, Analytical Procedure" was also used in the preliminary analysis.

In this method samples of the test substance are dissolved in methanol, sonicated, and diluted to volume with methanol. Aliquots of 10µl are injected into the HPLC employing an external standard technique with UV detection set at 254 nm. The retention time for picloram was reported at 1.2 minutes.

Method validation data regarding recovery, accuracy, precision, and linearity are adequate. Sample chromatograms and calculations are included with this submission.

**Physical and Chemical Properties, Subgroup B, Series 830.6302 to -830.7300 (40 CFR 158.190)**

Guideline Reference NO.(GRN 830.)/Title	Data Fulfilled	Value or Qualitative Description	MRID No.
.6302 Color	Y	White.	471219-01
.6303 Physical state	Y	Dry powder.	471219-01
.6304 Odor	Y	Characteristic odor.	471219-01
.6313 Stability		Picloram technical did not show complex formation (unreactive) with metals (copper, cadmium, lead, cobalt, chromium, and zinc).	471219-01
.6314 Oxidation-Reduction/Chemical Incompatibility	NA	The product does not possess oxidizing or reducing agents	
.6315 Flammability	Y	Considered non-flammable, decomposes upon heating.	471219-01
.6316 Explodability	Y	The product is unlikely to produce any risk of explosion.	471219-01
.6317 Storage Stability	G		
.6319 Miscibility	NA	Product is a TGAI & solid.	471219-01



.6320 Corrosion Characteristics	G		
.6321 Dielectric breakdown voltage	NA	Not required for a TGAI.	471219-01
.7000 pH	Y	2.87	471219-01
.7050 UV/Visible absorption	G		
.7100 Viscosity	NA	Product is a TGAI & solid.	471219-01
.7200 Melting Point	Y	202.9 °C	471219-01
.7300 Density/relative density/bulk density	Y	0.7451 g/cm <sup>3</sup> @ 20°C	471219-01
.7370 Dissociation Constant	Y	pK <sub>a</sub> = 2.18	471219-01
.7520 Particle size, fiber length, and diameter distribution	NA	Soluble in water	471219-01
.7550 Partition coefficient	Y	Log K <sub>ow</sub> = 1.77	471219-01
.7840 Water solubility	Y	554 mg/l @ 25°C at pH 2.8	471219-01
.xxxx Solubility in Organic Solvents @ 25°C	Y	Methanol..... 21.7 g/L Acetone.....18.9 g/L	471219-01
.7950 Vapor pressure	Y	9.18 X 10 <sup>-2</sup> mPa or 6.88 X 10 <sup>-7</sup> mmHg at 25°C.	471219-01
Explanations: Y =The requirements were fulfilled; N = The requirements not fulfilled; N/A = Not applicable; G = Data gap; U = Requires upgrading; I = Incomplete or in progress; W = Waived.			

Attachment:

Confidential Appendix A (pages 7-14).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**TECHNICAL REVIEW BRANCH  
SIMILARITY CLINIC DETERMINATION**

21/AUG/2007

MEMORANDUM

Subject: Name of Pesticide Product: Picloram Acid Technical  
EPA Reg. No. /File Symbol: 35935-GO  
DP Barcode: D340079  
Decision No: 376842  
PC Code: 005101  
Action Code: R31

From: Eugenia McAndrew, Biologist  
Technical Review Branch  
Registration Division (7505P)

To: Tobi Colvin-Snyder, RM Team 25  
Herbicide Branch  
Registration Division (7505P)

Applicant: Nufarm Limited  
150 Harvester Drive, suite 200  
Burr Ridge, Il 60527

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Picloram: 4-amino-3, 5, 6-trichloropicolinic acid	83.0
<u>Inert Ingredient(s):</u>	<u>7.0</u>
Total:	100.0%

**ACTION REQUESTED:** Similarity action is requested between the proposed product, Picloram Acid Technical, EPA File Symbol 35935-GO, and the cited product, Picloram Acid Technical, EPA Reg. No. 62719-78.

**BACKGROUND:** Nufarm Limited has applied for registration of Picloram Acid Technical, EPA File Symbol 35935-GO, claiming similarity to Picloram Acid Technical, EPA Reg. No. 62719-78. Both products are technical grade for manufacturing use only. The Registrant is using the cite-all method of data support to satisfy the acute toxicity data requirements.

**RECOMMENDATIONS:** TRB has evaluated the CSFs of the proposed product, 35935-GO, and the cited product, 62719-78, and has determined that the two products are substantially similar. However, there are considerable differences in the labeling of the proposed and cited products. The label submitted for the proposed product has a signal word of DANGER with precautionary labeling for a toxicity category of 1 based on the inhalation route of exposure. If the Registrant has additional data or information regarding the inhalation toxicity of the proposed product, the Registrant should submit it to the Agency. It is possible that the proposed label is based on the information in the August 1995 Picloram Reregistration Eligibility Document (RED). At that time, the inhalation LC<sub>50</sub> was given as 0.035 mg/L and it may be that the picloram had not been tested at a higher concentration as of that date.

The proposed basic CSF dated March 14, 2007 was reviewed by the TRB Product Chemistry Team (Malak; D340078; 15/AUG/2007). The review states that the CSF will be accepted after deficiencies are resolved.

This memorandum pertains only to the decision concerning whether the subject product is similar to the cited product from an acute toxicological view point. For the purposes of this action, TRB has made no determination of the adequacy of the toxicological data base or the precautionary label of the cited product.

**CONFIDENTIAL APPENDIX A: MANUFACTURING, COMPOSITION, AND IMPURITY INFORMATION**

Chemical: Picloram Acid Technical	Registration Number: 35935-GO	DP Barcode: 340078
CAS Number: 1918-02-1	Product Type: Herbicide	Test Substance: TGAI
Chemical Name: 4-amino-3,5,6-trichloropyridine-2-carboxylic acid		

*Group A - GRNs 830.1550; 830.1600; 830.1620; 830.1670; 830.1700; and 830.1750 Composition (CSF), Materials used to produce the product, Production process, Discussion of Formation of Impurities, Preliminary Analysis, and Certified limits:*

**GRN 830.1550 Product Composition:**

Compound/Component <sup>1</sup>			Nominal Concentration (% w/w)	Upper Certified Concentration (% w/w)	Lower Certified Concentration (% w/w)	Preliminary Analysis (% w/w) <sup>3</sup>	Mean $\pm$ r.s.d. (%)
No.	Name	Type <sup>2</sup>					
1	4-amino-3,5,6-trichloropyridine-2-carboxylic acid	A	93.00	95.79	90.21	93.00	Not reported



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 16 2005

## NOTICE OF PESTICIDE:

x Registration

EPA Reg. Number: 42750-78

Term of Issuance: Conditional

Name of Pesticide Product: Picloram Acid Technical

Albaugh, Inc.  
121 NE 18<sup>th</sup> St.  
Ankeny, IA 50021

This product is conditionally registered in accordance with FIFRA Section 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/ reregistration of your product under FIFRA when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA.
2. Within 18 months of the date of this registration, submit one-year storage stability and corrosion characteristics studies for review and acceptance.
3. Add on the front panel, "EPA Reg. No. 42750-78" and "EPA Est. No. 42750-XX-XX."

Under "Conditions for Sale and Warranty, and Disclaimer and Indemnity for Formulator's Uses"

The Agency has not reviewed or accepted these statements. It may need to be changed at a later date.

Submit one (1) copy of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

CONCURRENCES							
SYMBOL *	7505C	7505C					
SURNAME *	Bien	Tompkins					
DATE *	5-16-05	5-16-05					

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

**830-1700 Preliminary Analysis:**

Five batch analysis were performed in duplicate on picloram acid technical . The applicant reported the same ingredients, nominal concentrations, and upper/lower limits as those reported in the basic CSF dated 14/MAR/2007.

**830-1750 Certified Limits:**

The applicant reported the same certified limits as those found in duplicate analysis of five batches of picloram acid technical as reported in the proposed basic CSF dated 14/MAR/2007.



# DATA PACKAGE BEAN SHEET

Date: 25-May-2007

Page 1 of 2

Decision #: 376842

DP #: (340079)

PRIA 340078 chem

Parent DP#:

R31  
#21852

## \*\*\* Registration Information \*\*\*

Registration: 35935-GO - PICLORAM ACID TECHNICAL

Company: 35935 - NUFARM LIMITED

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# PY1 S-7337

Risk Manager Reviewer: Tobl Colvin-Snyder TSNYDER

Sent Date: 03-May-2007

Calculated Due Date: 02-Oct-2007

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (R31) NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMIST

Ingredients: 005101, Picloram(93%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 25-May-2007

Due Back: \_\_\_\_\_

DP Ingredient: 005101, Picloram

DP Title: Acute Toxicology Similarity Determination

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: \_\_\_\_\_

### Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 02-Sep-2007 ✓

Team Name: JAX

Science Due Date: \_\_\_\_\_

Reviewer Name: \_\_\_\_\_

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

No Studies

## \*\*\* Additional Data Package for this Decision \*\*\*

Printed on Page 2

## \*\*\* Data Package Instructions \*\*\*

Please review the attached labels and csfs (for both the proposed and cited product) and the acute toxicology review for the cited product. Please let me know if this product is substantially similar to the cited product for the purposes of both assessing acute toxicity and using generic data to support registration for this product.

Let me know if you need additional information.

Thanks.

Tobi

35935-60

705/6-79

DP#: (340079)

\*\*\* Additional Data Package for this Decision \*\*\*

Decision#: (376842)

DP #	Division/Branch	Date Sent	Date Due	Instructions?		CSF		Label	
340078	RD / TRB	25-May-2007	02-Sep-2007	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Yes	<input type="radio"/> No
340078	RD / HB	25-May-2007	02-Sep-2007	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Yes	<input type="radio"/> No

# DATA PACKAGE BEAN SHEET

Date: 25-May-2007

Page 1 of 2

Decision #: 376842

DP #: (340078)

PRIA

Parent DP#:

## \*\*\* Registration Information \*\*\*

Registration: 35935-GO - PICLORAM ACID TECHNICAL

Company: 35935 - NUFARM LIMITED

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# PY1 S-7337

Risk Manager Reviewer: Tobi Colvin-Snyder TSNYDER

Sent Date: 03-May-2007

Calculated Due Date: 02-Oct-2007

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (R31) NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMIST

Ingredients: 005101, Picloram(93%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 25-May-2007

Due Back: \_\_\_\_\_

DP Ingredient: 005101, Picloram

DP Title: Product Chemistry Review

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: \_\_\_\_\_

### Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 02-Sep-2007

Team Name: \_\_\_\_\_

Science Due Date: \_\_\_\_\_

Reviewer Name: \_\_\_\_\_

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

Printed on Page 2

## \*\*\* Additional Data Package for this Decision \*\*\*

No Additional Data Packages

## \*\*\* Data Package Instructions \*\*\*

Please review the attached csfs (for both the proposed and cited product) and the attached studies (MRIDs 47080701-02 and 47121901). Please let me know if the information satisfies product chemistry requirements for registration of this product, and also whether this product is substantially similar to the cited product for the purpose of using generic data to support registration of this product.

Let me know if you need additional information.

Thanks.

Tobi

MRID	MRID Summary	Citation Reference	Guideline
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1550/Product Identity and composition
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1600/Description of materials used to produce the product
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1620/Description of production process
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1670/Discussion of formation of impurities
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1750/Certified limits
47080701		Westmoreland, D. (2006) Picloram Technical Acid, NUP-06094: Product Identity and Process. Project Number: RTP/06/048/REG, 319961, 295132. Unpublished study prepared by Nufarm Limited. 98 p.	830.1800/Enforcement analytical method
47080702		Westmoreland, D. (2007) Picloram Technical Acid, NUP-06094: Preliminary Analysis. Project Number: RTP/07/012/REG, 0329/030/052/03. Unpublished study prepared by Nufarm Limited. 241 p.	830.1700/Preliminary analysis
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.6302/Color
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.6303/Physical state
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.6304/Odor
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.6313/Stability to sunlight, normal and elevated temperatures, metals, and metal ions
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7000/pH of water solutions or suspensions
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7200/Melting point/melting range
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7300/Density/relative density
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7370/Dissociation constant in water
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7550/Partition coefficient (n-octanol/water), shake flask method
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7840/Water solubility: Column elution method, shake flask method
47121901		Fickle, J. (2007) Product Chemistry-Physical Chemical Properties: (Picloram Acid Technical). Project Number: RTP/07/014/REG, RF/0329/001/138/03, RF/0329/020/143/03. Unpublished study prepared by Nufarm Americas, Inc. 209 p.	830.7950/Vapor pressure



Nufarm Limited  
George Meindl  
Registration Manager  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
george.meindl@us.nufarm.com

## TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Nufarm Limited  
150 Harvester Drive Suite 200  
Burr Ridge, IL 60527

2. Regulatory Action in Support of Which This Package is Submitted

Application for Pesticide Registration  
Picloram Acid Technical  
EPA File Symbol 3593-  
PRIA category R31 86  
New Product/Non-fast track  
New Source of an existing active ingredient using "Cite all" method

3. Date of this Submission

March 14, 2007

4. List of Submitted Studies

Volume 1  
Administrative Documents

PRIA letter  
Application for Pesticide Registration (EPA form 8570-1)  
Confidential Statement of Formula (EPA form 8570-4)  
Certification with Respect to Citation of Data (EPA form 8570-34)  
Data Matrix (EPA form 8570-35) both public and EPA versions  
Proposed draft labels (5 copies)

Volume 2  
(3 copies of all studies)

Product Chemistry (Guidelines 830.1550 - 1800)  
including the confidential attachment  
Product Chemistry (Guidelines 830.1700)  
including the confidential attachment






**Nufarm Limited**  
**George Meindl**  
**Registration Manager**  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
george.meindl@us.nufarm.com

Volume 3  
(3 copies of all studies)

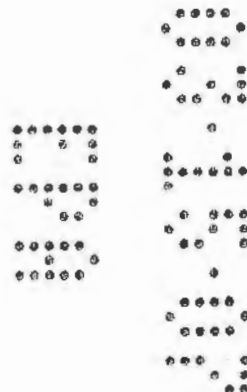
Color (Guideline 830.6302)  
Physical state (Guideline 830.6303)  
Odor (Guideline 830.6304)  
Stability to normal and elevated temperature, metals and metal ions (Guideline 830.6313)  
pH (Guideline 830.7000)  
Melting Point (Guideline 830.7200)  
Density/Relative Density/Bulk Density (Guideline 830.7300)  
Partition Coefficient (n-octanol/water), Shake Flask Method (Guideline 830.7550)  
Water Solubility, Shake Flask Method (Guideline 830.7840)  
Vapor Pressure (Guideline 830.7950)

Company Official: George Meindl

Signature: 

Company Name: Nufarm Limited

Company Contact: George Meindl Phone: 630.455.2017  
Registration Manager





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**1200 Pennsylvania Avenue, N.W.**  
**WASHINGTON, D.C. 20460**

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Nufarm Limited 150 Harvester Drive Suite 200 Burr Ridge IL 60527 630.455.2017	EPA Registration Number/File Symbol 35935-
Active Ingredient(s) and/or representative test compound(s) picloram	Date 2/26/2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) terrestrial food/nonfood crop, aquatic food/non-food crop, forestry, greenhouse food/nonfood crop,	Product Name Picloram Acid Technical

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT** (Check one method only)

<input checked="" type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
---	--

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date  
2/26/2007

Typed or Printed Name and Title  
Georga Meindl Registration Manager



CHEMICAL CHEMICAL NAME  
005101 Picloram

COMPANY#	000464	DOW CHEMICAL CO., THE
* DATA TYPES *		ATTN: GEORGE PAUL
EU AT EC FW EF OT		1803 BUILDING
XX XX XX XX		MIDLAND, MI 48674
COMPANY#	000475	RECKITT BENCKISER INC.
* DATA TYPES *		MORRIS CORPORATE CENTER IV
EU AT EC FW EF OT		PO BOX 0225
XX		PARSIPPANY, NJ 07054
COMPANY#	000777	RECKITT BENCKISER INC.
* DATA TYPES *		MORRIS CORPORATE CENTER IV
EU AT EC FW EF OT		PO BOX 0225
XX		PARSIPPANY, NJ 07054
COMPANY#	007969	BASF CORPORATION
* DATA TYPES *		AGRICULTURAL PRODUCTS
EU AT EC FW EF OT		PO BOX 13528
XX XX		RESEARCH TRIANGLE PARK, NC 27709
COMPANY#	042750	ALBAUGH, INC
* DATA TYPES *		Agent for: ALBAUGH INC
EU AT EC FW EF OT		PO BOX 2127
XX XX		VALDOSTA, GA 31604
COMPANY#	051036	BASF SPARKS LLC
* DATA TYPES *		PO BOX 13528
EU AT EC FW EF OT		RESEARCH TRIANGLE PARK, NC 27709
XX		
COMPANY#	062719	DOW AGROSCIENCES LLC
* DATA TYPES *		9330 ZIONSVILLE RD 308/2E
EU AT EC FW EF OT		INDIANAPOLIS, IN 46268
XX		
COMPANY#	070506	UNITED PHOSPHORUS INC
* DATA TYPES *		423 RIVERVIEW PLAZA
EU AT EC FW EF OT		TRENTON, NJ 08611
XX		
COMPANY#	074888	RESIDENTIAL EXPOSURE JOINT VENTURE (REJV)
* DATA TYPES *		900 17TH STREET, NW, SUITE 300
EU AT EC FW EF OT		WASHINGTON, DC 20006
XX		

DATE OUT: 14/AUG/2007

FEE Reference

FEE: PRODUCT CHEMISTRY REVIEW OF: A TECHNICAL GRADE TGAI [X]  
DP BARCODE: D340078 RECEIVED DATE: 25/MAY/2007 FILE SYMBOL#: 35935-GO  
PRODUCT NAME: Picloram Acid Technical MRIDs 470807-01 to 02 & 471219-01  
COMPANY NAME: Nufarm Limited FOOD USES [X] ACTION CODE: R31  
PPC NUMBER OF THIS TGAI: 005101 DECISION NO.: 376842

FROM: Sami Malak, Chemist *Sami Malak*  
Technical Review Branch/RD (7505P) *SBM 8/15/07*

TO: 25 James Tompkins/Tobi-Colvin Snyder  
Herbicide Branch/RD (7505P)

### INTRODUCTION:

The Herbicide Branch requested TRB to review this application for a "me-too" registration of subject product. The applicant is claiming its similarity to Picloram Acid Technical, Reg. No. 42750-78. In support of this application, the applicant included product chemistry data, a proposed basic CSF dated 14/MAR/2007, label EPA received on 15/MAR/2007, Certificate With Respect to Citation of Data, and Data Matrix.

### FINDINGS:

1. The subject product is a new TGAI produced for the applicant by [REDACTED] Picloram technical, CAS #1918-02-1, is 93% pure in the form of 4-amino-3,5,6-trichloropicolinic acid.
2. The subject product is substantially similar in composition and labeling to Picloram Acid Technical, Reg. No. 42750-78. The nominal concentration of the pending product falls between the standard upper and lower certified limits of the registered product, calculated by this reviewer at 97.85/92.15% (95%  $x \pm 0.03\%$ ).
3. The subject product, a Herbicide, will be used to formulate end-use products intended for weed control in crop areas.
- 3a. The applicant should be advised to submit product chemistry data pertaining to product's storage stability, corrosion characteristics, and UV/Visible absorption data requirement of GRNs 830.6317, 830.6320, and 830.7050, respectively.
- 3b. Except for the data gap in Finding 3(a) above, the submitted data is adequate and support a "me-too" registration of subject product.
- 4a. Adequate analytical method is available for enforcement. The method was previously submitted and reviewed in connection with registration of the registered product, picloram acid technical, Reg. No. 42750-78. A HPLC

analytical method was included with this submission, MRIDs #470807-01 & 470807-02. The method, entitled "Determination of Test Substance Purity, Analytical Procedure" was also used in the preliminary analysis. The method is reviewed in this memorandum.

- 4b. The applicant should be advised to submit the proposed analytical method and samples to the EPA's laboratory for validation (refer to Finding 4a above).
- 5. The label claim nominal concentrations of 93% picloram technical acid is consistent with that in the basic CSF dated 14/MAR/2007. Further, the storage and disposal statement and the physical or chemical hazards statement are in compliance with the regulations of 40CFR§156.78.
- 6a. The proposed basic CSF dated 14/MAR/2007, was filled out correctly and completely, however, the nominal concentration does not agree with that on the proposed label (refer to finding 5b). The upper and lower certified limits of the ingredients are within the standard limits of 40CFR§158.175(b)(2). All ingredients claimed on the CSF are cleared for use in pesticide formulations intended for food uses.
- 6b. There should be consistency between the label and CSF in listing the ingredient statement, listed as 4-amino-3,5,6-trichloropicolinic acid on the label and as 4-amino-3,5,6-trichloropyridine-2-carboxylic acid on the CSF.
- 6c. The applicant should be advised to complete box 8 of the CSF by indicating the pH value at 2.87 cited in the experimental data in MRID #471219-01.

#### **CONCLUSIONS:**

- 1. From the product chemistry point of view, the pending product is substantially similar in composition and labeling to Picloram Acid Technical, Reg. No. 42750-78 (Finding 2 above).
- 2. After resolving Findings 3(a), 4(b), 6(b), and 6(c) above, the TRB will have no objections for a "me-too" registration of subject product. The proposed basic CSF dated 14/MAR/2007 and label EPA received on 15/MAR/2007 will be accepted after resolving the deficiencies.

#### **VIEW OF PRODUCT CHEMISTRY DATA:**

- 1. A statement of data confidentiality dated 13/MAR/2007 was included with this submission claiming confidentiality of some of the submitted data on the basis of its falling within the scope of FIFRA§10(d)(1)(A), (B), or (C). Review of CBI data was moved to Confidential appendix A.
- 2. A GLP Statement dated 01/MAY/2006 was included with this submission to the

effect that some of the submitted studies were conducted in compliance with the GLP requirements of 40CFR§160 and the Laboratory Practices of OECD, revised in 1997.

Chemical Name (CAS, IUPAC, ANSI, etc.)	4-amino-3,5,6-trichloropyridine-2-carboxylic acid
Chemical Numbers (CAS; PC Code)	Reg. No. 35935-GO CAS No. 1918-02-1 PC Code 005101
Registration/Symbol No.	35935-GO
Type of Product (T, FI, MP, EP)	93% T
DP Barcode	D340078
Reviewer	Sami Malak, Ph.D.

The applicant has submitted the following MRID of product chemistry data:

<b>Table 1: Manufacturing and Impurity Data for picloram acid technical: 4-amino-3,5,6-trichloropyridine-2-carboxylic acid</b>				
GRN	Requirement	MRID	Status <sup>1</sup>	Details and/or Deficiency <sup>2</sup>
830.1550	Product Identity & Disclosure of Ingredients	470807-01	A	For product identity refer to text below. For product's composition refer to Confidential Appendix A for details.
830.1600 830.1620	Starting Materials & Manufacturing Process	470807-01	A	Refer to Confidential Appendix A for details.
830.1670	Discussion of Impurities	470807-01	A	Refer to Confidential Appendix A for details.
830.1700	Preliminary Analysis	470807-01 470807-02	A	Refer to Confidential Appendix A for details.
830.1750	Certification of Limits	470807-01	A	Refer to Confidential Appendix A for details.
830.1800	Analytical Methods	470807-01 470807-02	A	Refer to text for details
<sup>1</sup> A = Acceptable; N = Unacceptable (see Deficiency); N/A = Not Applicable. <sup>2</sup> Refer to CBI Appendix A for details.				

**Group A, Series 830-Product Identity, Composition, and Analysis (40 CFR 155, 160, 162, 167, 175 & 180)**

**830-1550 Product Identity and Composition**

The subject product is a new TGAI produced for the applicant by [REDACTED] Picloram technical, CAS #1918-02-1, is 93% pure.

Chemical name: 4-amino-3,5,6-trichloropyridine-2-carboxylic acid

Common Name: Picloram

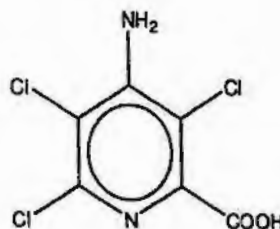
CAS #: 1918-02-1

Product category: Herbicide

Molecular Formula:  $C_6H_3Cl_3N_2O_2$

Molecular Weight: 241.5 g/mol

Molecular Structure:



830-1600 Description of Materials Used to Produce the Product:  
Refer to Confidential appendix A.

830-1620 Description of Production Process:  
Refer to Confidential appendix A.

830-1620 Discussion of Formation of Impurities:  
Refer to Confidential appendix A.

830-1700 Preliminary Analysis:  
Refer to Confidential appendix A.

830-1750 Certified Limits:  
Refer to Confidential appendix A.

### 830-1800 Enforcement Analytical Method:

Adequate analytical method is available for enforcement. The method was previously submitted and reviewed in connection with registration of the registered product, picloram acid technical, Reg. No. 42750-78. A HPLC analytical method was included with this submission, MRIDs #470807-01 & 470807-02. The method, entitled "Determination of Test Substance Purity, Analytical Procedure" was also used in the preliminary analysis.

In this method samples of the test substance are dissolved in methanol, sonicated, and diluted to volume with methanol. Aliquots of 10µl are injected into the HPLC employing an external standard technique with UV detection set at 254 nm. The retention time for picloram was reported at 1.2 minutes.

Method validation data regarding recovery, accuracy, precision, and linearity are adequate. Sample chromatograms and calculations are included with this submission.

### Physical and Chemical Properties, Subgroup B, Series 830.6302 to -830.7300 (40 CFR 158.190)

Guideline Reference NO.(GRN 830.)/Title	Data Fulfilled	Value or Qualitative Description	MRID No.
.6302 Color	Y	White.	471219-01
.6303 Physical state	Y	Dry powder.	471219-01
.6304 Odor	Y	Characteristic odor.	471219-01
.6313 Stability		Picloram technical did not show complex formation (unreactive) with metals (copper, cadmium, lead, cobalt, chromium, and zinc).	471219-01
.6314 Oxidation-Reduction/Chemical Incompatibility	NA	The product does not possess oxidizing or reducing agents	
.6315 Flammability	Y	Considered non-flammable, decomposes upon heating.	471219-01
.6316 Explodability	Y	The product is unlikely to produce any risk of explosion.	471219-01
.6317 Storage Stability	G		
.6319 Miscibility	NA	Product is a TGAI & solid.	471219-01



.6320 Corrosion Characteristics	G		
.6321 Dielectric breakdown voltage	NA	Not required for a TGAI.	471219-01
.7000 pH	Y	2.87	471219-01
.7050 UV/Visible absorption	G		
.7100 Viscosity	NA	Product is a TGAI & solid.	471219-01
.7200 Melting Point	Y	202.9 °C	471219-01
.7300 Density/relative density/bulk density	Y	0.7451 g/cm <sup>3</sup> @ 20°C	471219-01
.7370 Dissociation Constant	Y	pK <sub>a</sub> = 2.18	471219-01
.7520 Particle size, fiber length, and diameter distribution	NA	Soluble in water	471219-01
.7550 Partition coefficient	Y	Log K <sub>ow</sub> = 1.77	471219-01
.7840 Water solubility	Y	554 mg/l @ 25°C at pH 2.8	471219-01
.xxxx Solubility in Organic Solvents @ 25°C	Y	Methanol..... 21.7 g/L Acetone.....18.9 g/L	471219-01
.7950 Vapor pressure	Y	9.18 X 10 <sup>-2</sup> mPa or 6.88 X 10 <sup>-7</sup> mmHg at 25°C.	471219-01
Explanations: Y = The requirements were fulfilled; N = The requirements not fulfilled; N/A = Not applicable; G = Data gap; U = Requires upgrading; I = Incomplete or in progress; W = Waived.			

Attachment:

Confidential Appendix A (pages 7-14).

# **CONFIDENTIAL APPENDIX A: MANUFACTURING, COMPOSITION, AND IMPURITY INFORMATION**

Chemical: Picloram Acid Technical	Registration Number: 35935-GO	DP Barcode: 340078
CAS Number: 1918-02-1	Product Type: Herbicide	Test Substance: TGAI
Chemical Name: 4-amino-3,5,6-trichloropyridine-2-carboxylic acid		

*Group A - GRNs 830.1550; 830.1600; 830.1620; 830.1670; 830.1700; and 830.1750 Composition (CSF), Materials used to produce the product, Production process, Discussion of Formation of Impurities, Preliminary Analysis, and Certified limits:*

## **GRN 830.1550 Product Composition:**

Compound/Component <sup>1</sup>			Nominal Concentration (% w/w)	Upper Certified Concentration (% w/w)	Lower Certified Concentration (% w/w)	Preliminary Analysis (% w/w) <sup>3</sup>	Mean $\pm$ r.s.d. (%)
No.	Name	Type <sup>2</sup>					
1	4-amino-3,5,6-trichloropyridine-2-carboxylic acid	A	93.00	95.79	90.21	93.00	Not reported





**830-1700 Preliminary Analysis:**

Five batch analysis were performed in duplicate on picloram acid technical . The applicant reported the same ingredients, nominal concentrations, and upper/lower limits as those reported in the basic CSF dated 14/MAR/2007.

**830-1750 Certified Limits:**

The applicant reported the same certified limits as those found in duplicate analysis of five batches of picloram acid technical as reported in the proposed basic CSF dated 14/MAR/2007.

# DATA PACKAGE BEAN SHEET

Date: 25-May-2007

Page 1 of 2

Decision #: 376842

DP #: (340079)

PRIA

Parent DP#:

## \*\*\* Registration Information \*\*\*

Registration: 35935-GO - PICLORAM ACID TECHNICAL

Company: 35935 - NUFARM LIMITED

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# PY1 S-7337

Risk Manager Reviewer: Tobi Colvin-Snyder TSNYDER

Sent Date: 03-May-2007

Calculated Due Date: 02-Oct-2007

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (R31) NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMIST

Ingredients: 005101, Picloram(93%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 25-May-2007

Due Back: \_\_\_\_\_

DP Ingredient: 005101, Picloram

DP Title: Acute Toxicology Similarity Determination

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: \_\_\_\_\_

### Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 02-Sep-2007

Team Name: \_\_\_\_\_

Science Due Date: \_\_\_\_\_

Reviewer Name: \_\_\_\_\_

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

No Studies

## \*\*\* Additional Data Package for this Decision \*\*\*

Printed on Page 2

## \*\*\* Data Package Instructions \*\*\*

Please review the attached labels and csfs (for both the proposed and cited product) and the acute toxicology review for the cited product. Please let me know if this product is substantially similar to the cited product for the purposes of both assessing acute toxicity and using generic data to support registration for this product.

Let me know if you need additional information.

Thanks.

Tobi

DP#: (340079)

\*\*\* Additional Data Package for this Decision \*\*\*

Decision#: (376842)

DP #	Division/Branch	Date Sent	Date Due	Instructions?		CSF		Label	
340078	RD / TRB	25-May-2007	02-Sep-2007	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Yes	<input type="radio"/> No
340078	RD / HB	25-May-2007	02-Sep-2007	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Yes	<input type="radio"/> No



George.Meindl@us.nufarm.co  
m  
05/25/2007 12:00 PM

To Tobi Colvin-Snyder/DC/USEPA/US@EPA  
cc  
bcc

Subject re: EPA file symbol 35935-GO - Picloram Acid Technical

Dear Tobi - as we just discussed, instead of considering our pending registration substantially similar to EPA Reg. No. 62719-179 please change it to being substantially similar to EPA Reg. No. 42750-78

Thank you for your help on this matter and let me know if you have any further questions.

George Meindl  
Registration Manager  
Nufarm Americas Inc.  
150 Harvester Drive Suite 200  
Burr Ridge, IL 60527  
phone 630.455.2000 (main)  
phone 630.455.2017 (direct)  
fax 630.455.2030 (regulatory dept.)  
email george.meindl@us.nufarm.com

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

March 16, 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT  
Or Pay On-Line at [www.Pay.Gov](http://www.Pay.Gov) (See Below for Details)

OPP Decision Number: D-376842  
EPA File Symbol or Registration Number: 35935-GO  
Product Name: PICLORAM ACID TECHNICAL  
EPA Receipt Date: 15-Mar-2007  
EPA Company Number: 35935  
Company Name: NUFARM LIMITED

George Meindl  
NUFARM LIMITED  
NUFARM LIMITED  
PO Box 13439  
RTP, NC 27709-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R31

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT  
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

Please remit payment in the amount of: \$ 4,200 to:

By USPS:  
USEPA Washington Finance Center  
Pesticide Registration Service Fee  
PO Box 360277  
Pittsburgh, PA 15251

**By Courier:**

U.S. EPA Washington Finance Center  
Pesticide Registration Service Fee  
C/O Mellon Client Service Center  
500 Ross Street, Room 670  
Box 360277  
Pittsburgh, PA 15251-6277  
Attn: EPA Module Supervisor  
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit [www.pay.gov](http://www.pay.gov). From the pay.gov home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at [www.epa.gov/pesticides/fees](http://www.epa.gov/pesticides/fees).

Please send Registration Service Fee Waiver requests to:

**By USPS:**

Document Processing Desk (WAIVER)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20460

**By Courier:**

Document Processing Desk (WAIVER)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Room S4900 Potomac Yard 1  
2777 S. Crystal Dr.  
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee

Ombudsman at (703) 305-6249.

Sincerely,



Front End Processing Staff  
Information Technology & Resources Management Division





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

May 4, 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

NUFARM LIMITED  
PO Box 13439  
RTP, NC 27709-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 03-MAY-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3

S: 809771

Regulation: ☒ Yes ☐ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: New Registration

Billable: ☐ Yes ☒ No

Company: 35935 NUFARM LIMITED

V

Risk Manager: Registration Division, Risk Management Team 25

Product #: 35935-GO

Product Name: PICLORAM ACID TECHNICAL

Overseas:

Me Too Section3: 62719-179

Me Too Product Name: PICLORAM TECHNICAL

Application Date: 03-May-2007

OPP Rec'd Date: 03-May-2007

Front End Date: 03-May-2007

Risk Manager Send Date: 03-May-2007

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description: resubmission following 86-5 rejection

New Ingredient Request Date:

New Ingredient Received Date:

Form Br: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content: Study



Nufarm Limited  
George Meindl  
Registration Manager  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
[george.meindl@us.nufarm.com](mailto:george.meindl@us.nufarm.com)

March 14, 2007

Via Overnight Courier

James Tompkins (PM-25)  
Document Processing Desk (REGFEE)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

Subject: Picloram Acid Technical  
EPA Reg. No. 35935-  
Application for a New Product Registration  
Non-Fast track request R31 (86)

Dear Mr. Tompkins:

Nufarm Limited is interested in registering the subject product. Under the Pesticide Registration Improvement Act of 2003, it is our opinion that this action falls under category R31 86, new product non-fast track. We believe this is the appropriate category since this application is for a new source of an existing technical (active ingredient picloram) using a "cite-all" method. Nufarm anticipates this action requires a fee of \$ 4,200 with a six -month review time at the Agency.

To process this request please find attached the transmittal document listing the administrative material and all the submitted studies needed to support this registration request.

If you should have any questions regarding this matter, feel free to contact me at 630.455.2017 or email at [george.meindl@us.nufarm.com](mailto:george.meindl@us.nufarm.com),

Thank you,

A handwritten signature in black ink that reads 'George Meindl'.

George Meindl  
Registration Manager  
Nufarm Limited



**Nufarm Limited**  
George Meindl  
Registration Manager  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
george.meindl@us.nufarm.com

## TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Nufarm Limited  
150 Harvester Drive Suite 200  
Burr Ridge, IL 60527

2. Regulatory Action in Support of Which This Package is Submitted

Application for Pesticide Registration  
Picloram Acid Technical  
EPA File Symbol 3593-  
PRIA category R31 86  
New Product/Non-fast track  
New Source of an existing active ingredient using "Cite all" method

3. Date of this Submission

March 14, 2007

4. List of Submitted Studies

Volume 1  
Administrative Documents

PRIA letter  
Application for Pesticide Registration (EPA form 8570-1)  
Confidential Statement of Formula (EPA form 8570-4)  
Certification with Respect to Citation of Data (EPA form 8570-34)  
Data Matrix (EPA form 8570-35) both public and EPA versions  
Proposed draft labels (5 copies)

Volume 2  
(3 copies of all studies)

- 47080701** Product Chemistry (Guidelines 830.1550 - 1800)  
including the confidential attachment
- 47080702** Product Chemistry (Guidelines 830.1700)  
including the confidential attachment

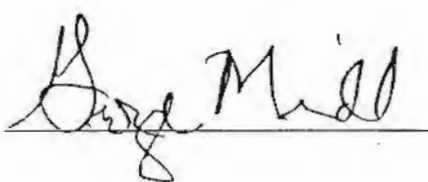


Nufarm Limited  
George Meindl  
Registration Manager  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
george.meindl@us.nufarm.com

Volume 3  
(3 copies of all studies)

47121901 Color (Guideline 830.6302)  
Physical state (Guideline 830.6303)  
Odor (Guideline 830.6304)  
Stability to normal and elevated temperature, metals and metal ions (Guideline 830.6313)  
pH (Guideline 830.7000)  
Melting Point (Guideline 830.7200)  
Density/Relative Density/Bulk Density (Guideline 830.7300)  
Partition Coefficient (n-octanol/water), Shake Flask Method (Guideline 830.7550)  
Water Solubility, Shake Flask Method (Guideline 830.7840)  
Vapor Pressure (Guideline 830.7950)

Company Official: George Meindl

Signature: 

Company Name: Nufarm Limited

Company Contact: George Meindl  
Registration Manager

Phone: 630.455.2017

## MEMORANDUM

DATE: 5/8/07

TO: PM 25, Regulatory Manager

FROM: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission  
☐ partially accepted submission  
☐ rejected submission

Administrative

Materials



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

March 19, 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

NUFARM LIMITED  
PO Box 13439  
RTP, NC 27709-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 15-MAR-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 86-5, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents.

If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below.

These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels.

The rejected studies and their deficiencies are described below.

Rejected Study [03]:

\* A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40CFR160 is required for all studies (except rangefinding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.





Nufarm Limited  
George Meindl  
Registration Manager  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
[george.meindl@us.nufarm.com](mailto:george.meindl@us.nufarm.com)

March 14, 2007

Via Overnight Courier

James Tompkins (PM-25)  
Document Processing Desk (REGFEE)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

Subject: Picloram Acid Technical  
EPA Reg. No. 35935-  
Application for a New Product Registration  
Non-Fast track request R31 (86)

Dear Mr. Tompkins:

Nufarm Limited is interested in registering the subject product. Under the Pesticide Registration Improvement Act of 2003, it is our opinion that this action falls under category R31 86, new product non-fast track. We believe this is the appropriate category since this application is for a new source of an existing technical (active ingredient picloram) using a "cite-all" method. Nufarm anticipates this action requires a fee of \$ 4,200 with a six -month review time at the Agency.

To process this request please find attached the transmittal document listing the administrative material and all the submitted studies needed to support this registration request.

If you should have any questions regarding this matter, feel free to contact me at 630.455.2017 or email at [george.meindl@us.nufarm.com](mailto:george.meindl@us.nufarm.com),

Thank you,

A handwritten signature in black ink, appearing to read 'George Meindl', written over a horizontal line.

George Meindl  
Registration Manager  
Nufarm Limited



**Nufarm Limited**  
**George Meindl**  
**Registration Manager**  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
george.meindl@us.nufarm.com

## TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Nufarm Limited  
150 Harvester Drive Suite 200  
Burr Ridge, IL 60527

2. Regulatory Action in Support of Which This Package is Submitted

Application for Pesticide Registration  
Picloram Acid Technical  
EPA File Symbol 3593-  
PRIA category R31 86  
New Product/Non-fast track  
New Source of an existing active ingredient using "Cite all" method

3. Date of this Submission

March 14, 2007

4. List of Submitted Studies

Volume 1  
Administrative Documents

PRIA letter  
Application for Pesticide Registration (EPA form 8570-1)  
Confidential Statement of Formula (EPA form 8570-4)  
Certification with Respect to Citation of Data (EPA form 8570-34)  
Data Matrix (EPA form 8570-35) both public and EPA versions  
Proposed draft labels (5 copies)

Volume 2  
(3 copies of all studies)

**47080701** Product Chemistry (Guidelines 830.1550 - 1800)  
including the confidential attachment

**47080702** Product Chemistry (Guidelines 830.1700)  
including the confidential attachment




Nufarm Limited  
George Meindl  
Registration Manager  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
george.meindl@us.nufarm.com

Volume 3  
(3 copies of all studies)

**Reject (03)** Color (Guideline 830.6302)  
Physical state (Guideline 830.6303)  
Odor (Guideline 830.6304)  
Stability to normal and elevated temperature, metals and metal ions (Guideline 830.6313)  
pH (Guideline 830.7000)  
Melting Point (Guideline 830.7200)  
Density/Relative Density/Bulk Density (Guideline 830.7300)  
Partition Coefficient (n-octanol/water), Shake Flask Method (Guideline 830.7550)  
Water Solubility, Shake Flask Method (Guideline 830.7840)  
Vapor Pressure (Guideline 830.7950)

Company Official: George Meindl

Signature: 

Company Name: Nufarm Limited

Company Contact: George Meindl Phone: 630.455.2017  
Registration Manager



George.Meindl@us.nufarm.com  
05/01/2007 04:55 PM

To Tobi Colvin-Snyder/DC/USEPA/US@EPA  
cc  
bcc

Subject Re: Rejected study for 35935-GO

History: This message has been forwarded.

Hi Tobi - here is the replacement page 3. Let me know if you have any further questions.

(See attached file: 2007.05.01.PDF)

Thank you for your help this afternoon.

George Meindl  
Registration Manager  
Nufarm Americas Inc.  
150 Harvester Drive Suite 200  
Burr Ridge, IL 60527  
phone 630.455.2000 (main)  
phone 630.455.2017 (direct)  
fax 630.455.2030 (regulatory dept.)  
email george.meindl@us.nufarm.com

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Colvin-Snyder.Tob  
i@epamail.epa.gov

05/01/2007 01:59  
PM

george.meindl@us.nufarm.com

To  
cc

Subject  
Rejected study for 35935-GO

Hi George,

We spoke about this a few weeks ago. I'm attaching a copy of the rejection notice for this study. Please send me a revised GLP statement page SIGNED AND DATED BY THE STUDY SPONSOR for this study. You can e-mail a scanned copy if you like, and I'll replace the pages in the 3 rejected volumes that I have here. Feel free to call me at 703-305-7801 if you have any questions.

Tobi

----- Forwarded by Tobi Colvin-Snyder/DC/USEPA/US on 05/01/2007 02:57 PM -----

Dot Not Reply

05/01/2007 02:46  
PM

To  
Tobi  
Colvin-Snyder/DC/USEPA/US@EPA

cc

Subject

Scan From MFP

DOT NOT REPLY TO THIS MESSAGE

(See attached file: scan.pdf) [attachment "scan.pdf" deleted by George



Meindl/US/Nufarm] 2007.05.01.PDF



Nufarm Limited  
George Meindl  
Registration Manager  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
[george.meindl@us.nufarm.com](mailto:george.meindl@us.nufarm.com)

March 14, 2007

Via Overnight Courier

James Tompkins (PM-25)  
Document Processing Desk (REGFEE)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

Subject: Picloram Acid Technical  
EPA Reg. No. 35935-  
Application for a New Product Registration  
Non-Fast track request R31 (86)

Dear Mr. Tompkins:

Nufarm Limited is interested in registering the subject product. Under the Pesticide Registration Improvement Act of 2003, it is our opinion that this action falls under category R31 86, new product non-fast track. We believe this is the appropriate category since this application is for a new source of an existing technical (active ingredient picloram) using a "cite-all" method. Nufarm anticipates this action requires a fee of \$ 4,200 with a six -month review time at the Agency.

To process this request please find attached the transmittal document listing the administrative material and all the submitted studies needed to support this registration request.

If you should have any questions regarding this matter, feel free to contact me at 630.455.2017 or email at [george.meindl@us.nufarm.com](mailto:george.meindl@us.nufarm.com),

Thank you,

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George Meindl  
Registration Manager  
Nufarm Limited



**Nufarm Limited**  
**George Meindl**  
**Registration Manager**  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
george.meindl@us.nufarm.com

## TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Nufarm Limited  
150 Harvester Drive Suite 200  
Burr Ridge, IL 60527

2. Regulatory Action in Support of Which This Package is Submitted

Application for Pesticide Registration  
Picloram Acid Technical  
EPA File Symbol 3593-  
PRIA category R31 86  
New Product/Non-fast track  
New Source of an existing active ingredient using "Cite all" method

3. Date of this Submission

March 14, 2007

4. List of Submitted Studies

Volume 1  
Administrative Documents

PRIA letter  
Application for Pesticide Registration (EPA form 8570-1)  
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Data Matrix (EPA form 8570-35) both public and EPA versions  
Proposed draft labels (5 copies)

Volume 2  
(3 copies of all studies)

- 47080701** Product Chemistry (Guidelines 830.1550 - 1800)  
including the confidential attachment
- 47080702** Product Chemistry (Guidelines 830.1700)  
including the confidential attachment



**Nufarm Limited**

**George Meindl**

**Registration Manager**

150 Harvester Drive, Suite 200

Burr Ridge, IL 60527

Phone: 630.455.2017 Fax: 630.455.2030

george.meindl@us.nufarm.com

Volume 3  
(3 copies of all studies)

**Reject (03)** Color (Guideline 830.6302)  
Physical state (Guideline 830.6303)  
Odor (Guideline 830.6304)  
Stability to normal and elevated temperature, metals and metal ions (Guideline 830.6313)  
pH (Guideline 830.7000)  
Melting Point (Guideline 830.7200)  
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Partition Coefficient (n-octanol/water), Shake Flask Method (Guideline 830.7550)  
Water Solubility, Shake Flask Method (Guideline 830.7840)  
Vapor Pressure (Guideline 830.7950)

Company Official: George Meindl

Signature: \_\_\_\_\_

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Company Name: Nufarm Limited

Company Contact: George Meindl  
Registration Manager

Phone: 630.455.2017



Tobi  
Colvin-Snyder/DC/USEPA/US

To george.meindl@us.nufarm.com

cc

05/01/2007 02:59 PM

bcc

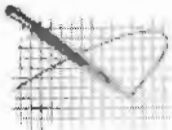
Subject Rejected study for 35935-GO

Hi George,

We spoke about this a few weeks ago. I'm attaching a copy of the rejection notice for this study. Please send me a revised GLP statement page SIGNED AND DATED BY THE STUDY SPONSOR for this study. You can e-mail a scanned copy is you like, and I'll replace the pages in the 3 rejected volumes that I have here. Feel free to call me at 703-305-7801 if you have any questions.

Tobi

----- Forwarded by Tobi Colvin-Snyder/DC/USEPA/US on 05/01/2007 02:57 PM -----



Dot Not Reply

05/01/2007 02:46 PM

To Tobi Colvin-Snyder/DC/USEPA/US@EPA

cc

Subject Scan From MFP

DOT NOT REPLY TO THIS MESSAGE



scan.pdf

100

# MEMORANDUM

DATE: 08/20/07

TO: PTL 25, Regulatory Manager

FROM: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission  
☐ partially accepted submission  
☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

March 19, 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

NUFARM LIMITED  
PO Box 13439  
RTP, NC 27709-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 15-MAR-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 86-5, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents.

If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below.

These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels.

The rejected studies and their deficiencies are described below.

Rejected Study [03]:

\* A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40CFR160 is required for all studies (except rangefinding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.

Administrative

Materials



ADMINISTRATIVE NO(S): 35135-40

\_\_\_\_\_  
\_\_\_\_\_

PM: 25

CHEMICAL NO.: \_\_\_\_\_

The jacket for this action can be  
requested through the JACKETS system.

# **FEE FOR SERVICE**



Nufarm Limited  
George Meindl  
Registration Manager  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
[george.meindl@us.nufarm.com](mailto:george.meindl@us.nufarm.com)

March 14, 2007

Via Overnight Courier

James Tompkins (PM-25)  
Document Processing Desk (REGFEE)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

Subject: Picloram Acid Technical  
EPA Reg. No. 35935-  
Application for a New Product Registration  
Non-Fast track request R31 (86)

Dear Mr. Tompkins:

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Thank you,

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George Meindl  
Registration Manager  
Nufarm Limited



Nufarm Limited  
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Nufarm Limited  
George Meindl  
Registration Manager  
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Phone: 630.455.2017 Fax: 630.455.2030  
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Odor (Guideline 830.6304)  
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Vapor Pressure (Guideline 830.7950)

Company Official: George Meindl

Signature: \_\_\_\_\_

A handwritten signature in dark ink, appearing to read 'George Meindl', written over a horizontal line.

Company Name: Nufarm Limited

Company Contact: George Meindl  
Registration Manager

Phone: 630.455.2017

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOTICE OF PESTICIDE:

EPA Reg. Number: 42750-79

Term of Issuance: Conditional

Name of Pesticide Product: Picloram K-Salt Rangeland

x Registration

JUN 23 2005

This product is conditionally registered in accordance with FIFRA Section 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/ reregistration of your product under FIFRA Sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
2. Within 18 months of the date of this registration, submit one-year storage stability and corrosion characteristics studies for review and acceptance.
3. Add on the front panel, "EPA Reg. No. 42750-79" and "EPA Est. No. 42750-XX-XX."
4. Under "Environmental Hazards";

Add "or rinsate" after "Do not contaminated water . . . by cleaning of equipment."

5. "Under Precautionary Statements";  
Add the following statement:

"Prolonged or frequent repeated skin contact may cause allergic reactions in some individuals."

6. "Under Personal Protective Equipment";

It is recommended that you add the following statements:

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

7. "Under Environmental Hazards";

Add "or rinsate" after "by cleaning of equipment"

8. Under "Directions for Use";

Add the following sentences:

- Do not enter or allow others to enter the treated area until sprays have dried.
- **This product is not intended for manufacturing or formulating.**

9. Under "Precautions and Restrictions";

Add the following:

- Use this product only as specified on this label.
- Add the following paragraph after "Avoid injurious spray drift":

For aerial application on rights-of-way or other areas near susceptible crops, use drift control additive as recommended by the manufacturer.

10. Under "Maximum Use Rate";

The EPA Picloram Reregistration Eligibility Decision (RED) document specifies the following application rates:

"Broadcast rate for range and pasture use is lowered from the current maximum of 2.0 lb. to 0.5 ae/A for control of broadleaf weeds and woody plants. For the control of noxious weeds, a broadcast application of up to 1.0 lb. ae/A may be used annually. Spot treatment will be lowered to a maximum of 1.0 lb. ae/A with no more than 50% of an acre being treated. Spot treatments and broadcast treatments can be applied during the same growing season only if the total amount applied does not exceed 1.0 ae/A per annual growing season" (Page 93, Picloram RED).

Adjust your application rates accordingly for all applications specified in this label.

11. Under "Use Restrictions - Specific Use Directions for Small Grains, Fallow Cropland, and CRP Acres";

Add "grain sorghum or fallowed. Do not plant grain sorghum within 8 months after application. This product is not intended for use on land planted to sweet sorghum." after "Use only on land that will be planted the following year to grass, barley, oats, wheat."

12. A Picloram Stewardship Program accepted by the Agency must be in place prior to release of the product for shipment.

# Fee for Service

806937K~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☒ Studies? ☐ Fee Waiver?  
volpay % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 25

Receipt No.

S- 806937

EPA File Symbol/Reg. No.

35935-GO

Pin-Punch Date:

3/15/2007

☐ This item is NOT subject to FFS action.

## Action Code:

Requested:

R 31

Granted:

R 31

Amount Due: \$ 4,200<sup>00</sup>

## Parent/Child Decisions:

Reviewer: J. Miller

Date: 3-16-07

Remarks:

Receipt for Section 3					
S:	806937	Resubmission	<input type="radio"/> Yes <input checked="" type="radio"/> No		
Regulatory Type:	Product Registration - Section 3	Fee For Service:	<input checked="" type="radio"/> Yes <input type="radio"/> No	<div>Print Letter</div> <div>Enter More Information</div> <div>Tracking</div>	
Application Type:	New Registration	Billable:	<input checked="" type="radio"/> Yes <input type="radio"/> No		
Company:	35935 NUFARM LIMITED		V		
Risk Manager:	Registration Division, Risk Management Team 25				
Product #:	35935-GO	Product Name:	PICLORAM ACID TECHNICAL		
Version#:					
Me Too Section3:	62719-179	Me Too Product Name:	PICLORAM TECHNICAL		
Application Date:	14-Mar-2007	OPP Rec'd Date:	15-Mar-2007	<div>Receipt Content</div> <div>Study</div>	
Front End Date:	15-Mar-2007	Risk Manager Send Date:			
FFS Due Date:		Negotiated Due Date:			
OPP Target Date:					
Fast Track:	<input type="checkbox"/>	New Ingredient:	<input type="checkbox"/>		
Receipt Description:					
NEW PRODUCT REGISTRATION REQUEST - NON-FAST TRACK.					
Form A	<input type="checkbox"/>	Signature Date		Form B	<input type="checkbox"/>
		Signature Date			



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

<b>United States</b> <b>Environmental Protection Agency</b> Washington, DC 20460		<input checked="" type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Amendment</b> <input type="checkbox"/> <b>Other</b>	OPP Identifier Number
<b>Application for Pesticide - Section I</b>			
1. Company/Product Number 35935- <u>GO</u>		2. EPA Product Manager James Tompkins	
4. Company/Product (Name) Picloram Acid Technical		3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Limited 150 Harvester Drive Suite 200 Burr Ridge, IL 60527  <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>62719-179</u>  Product Name <u>Picloram Technical</u>	
<b>Section - II</b>			
<input type="checkbox"/> Amendment - Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	
<input type="checkbox"/> Resubmission in response to Agency letter dated _____		<input type="checkbox"/> "Me Too" Application.	
<input type="checkbox"/> Notification - Explain below.		<input checked="" type="checkbox"/> Other - Explain below.	
<b>Explanation:</b> Use additional page(s) if necessary. (For section I and Section II.) R31 New product registration request - non-fast track \$4200.00 6 month review Product is substantially similar to Dow's Picloram Technical			
<b>Section - III</b>			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input type="checkbox"/>	
<input type="checkbox"/> Other _____			
<b>Section - IV</b>			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name George Meindl (george.meindl@us.nufarm.com)		Title Registration Manager	
		Telephone No. (Include Area Code) 630.455. 2017	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			8. Date Application Received  (Stamped)
2. Signature 		3. Title Registration Manager	
4. Typed Name George Meindl		5. Date 3/14/07	



Nufarm Limited  
George Meindl  
Registration Manager  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Phone: 630.455.2017 Fax: 630.455.2030  
george.meindl@us.nufarm.com

March 14, 2007

Via Overnight Courier

James Tompkins (PM-25)  
Document Processing Desk (REGFEE)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

Subject: Picloram Acid Technical  
EPA Reg. No. 35935-  
Application for a New Product Registration  
Non-Fast track request R31 (86)

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Thank you,

George Meindl  
Registration Manager  
Nufarm Limited





Nufarm Limited  
George Meindl  
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Thank you,

George Meindl  
Registration Manager  
Nufarm Limited







**Nufarm Limited**  
George Meindl  
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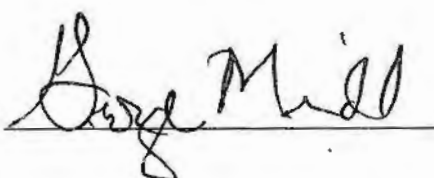


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Vapor Pressure (Guideline 830.7950)

Company Official: George Meindl

Signature: 

Company Name: Nufarm Limited

Company Contact: George Meindl Phone: 630.455.2017  
Registration Manager





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**1200 Pennsylvania Avenue, N.W.**  
**WASHINGTON, D.C. 20460**

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Nufarm Limited 150 Harvester Drive Suite 200 Burr Ridge IL 60527 630.455.2017	EPA Registration Number/File Symbol 35935-
Active Ingredient(s) and/or representative test compound(s) picloram	Date 2/26/2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) terrestrial food/nonfood crop, aquatic food/non-food crop, forestry, greenhouse food/nonfood crop,	Product Name Picloram Acid Technical

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT** (Check one method only)

<input checked="" type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
---	--

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

**I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.**

Signature 	Date 2/26/2007	Typed or Printed Name and Title George Meindl Registration Manager
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CHEMICAL CHEMICAL NAME  
005101 Picloram

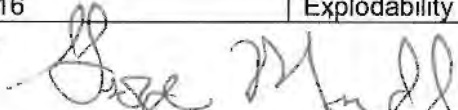
COMPANY#	000464	DOW CHEMICAL CO., THE
* DATA TYPES *		ATTN: GEORGE PAUL
EU AT EC FW EF OT		1803 BUILDING
XX XX XX XX		MIDLAND, MI 48674
COMPANY#	000475	RECKITT BENCKISER INC.
* DATA TYPES *		MORRIS CORPORATE CENTER IV
EU AT EC FW EF OT		PO BOX 0225
XX		PARSIPPANY, NJ 07054
COMPANY#	000777	RECKITT BENCKISER INC.
* DATA TYPES *		MORRIS CORPORATE CENTER IV
EU AT EC FW EF OT		PO BOX 0225
XX		PARSIPPANY, NJ 07054
COMPANY#	007969	BASF CORPORATION
* DATA TYPES *		AGRICULTURAL PRODUCTS
EU AT EC FW EF OT		PO BOX 13528
XX XX		RESEARCH TRIANGLE PARK, NC 27709
COMPANY#	042750	ALBAUGH, INC
* DATA TYPES *		Agent for: ALBAUGH INC
EU AT EC FW EF OT		PO BOX 2127
XX XX		VALDOSTA, GA 31604
COMPANY#	051036	BASF SPARKS LLC
* DATA TYPES *		PO BOX 13528
EU AT EC FW EF OT		RESEARCH TRIANGLE PARK, NC 27709
XX		
COMPANY#	062719	DOW AGROSCIENCES LLC
* DATA TYPES *		9330 ZIONSVILLE RD 308/2E
EU AT EC FW EF OT		INDIANAPOLIS, IN 46268
XX		
COMPANY#	070506	UNITED PHOSPHORUS INC
* DATA TYPES *		423 RIVERVIEW PLAZA
EU AT EC FW EF OT		TRENTON, NJ 08611
XX		
COMPANY#	074888	RESIDENTIAL EXPOSURE JOINT VENTURE (REJV)
* DATA TYPES *		900 17TH STREET, NW, SUITE 300
EU AT EC FW EF OT		WASHINGTON, DC 20006
XX		

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.  
WASHINGTON, D.C. 20460

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

## DATA MATRIX

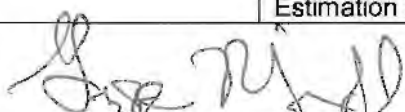
Date February 26, 2007			EPA Reg No./File Symbol 35935-		Page 1 of 4
Applicant's/Registrant's Name & Address  Nufarm Limited 150 Harvester Drive Suite 200 Burr Ridge, IL 60527			Product  Picloram Technical		
Ingredient Picloram					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Product Specific Data Requirements</b>					
830.1550	Product Identity and Composition	Volume 2	Nufarm Limited	OWN	
830.1600	Description of Materials Used to Produce the Product	Volume 2	Nufarm Limited	OWN	
830.1620	Description of Production Process	Volume 2	Nufarm Limited	OWN	
830.1650	Description of Formulation Process				Not required <sup>1</sup>
830.1670	Discussion of Formation of Impurities	Volume 2	Nufarm Limited	OWN	
830.1700	Preliminary Analysis	Volume 2	Nufarm Limited	OWN	
830.1750	Certified Limits	Volume 2	Nufarm Limited	OWN	
830.1800	Enforcement Analytical Method	Volume 2	Nufarm Limited	OWN	
830.6302	Color	Volume 3	Nufarm Limited	OWN	
830.6303	Physical State	Volume 3	Nufarm Limited	OWN	
830.6304	Odor	Volume 3	Nufarm Limited	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	Volume 3	Nufarm Limited	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility				Not required <sup>2</sup>
830.6315	Flammability				Not required <sup>2</sup>
830.6316	Explosibility				Not required <sup>2</sup>
Signature 			Name and Title George Meindl, Registration Manager		Date 3/14/07

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Ingredient Picloram					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability				Not required <sup>2</sup>
830.6319	Miscibility				Not required <sup>2</sup>
830.6320	Corrosion Characteristics				Not required <sup>2</sup>
830.6321	Dielectric Breakdown Voltage				Not required <sup>2</sup>
830.7000	pH	Volume 3	Nufarm Limited	OWN	
830.7050	UV/Visible Absorption				Not required <sup>2</sup>
830.7100	Viscosity				Not required <sup>2</sup>
830.7200	Melting Point/Melting Range	Volume 3	Nufarm Limited	OWN	
830.7220	Boiling Point/Boiling Range				Not required <sup>3</sup>
830.7300	Density/Relative Density/Bulk Density	Volume 3	Nufarm Limited	OWN	
830.7370	Dissociation Constants in Water				Not required <sup>2</sup>
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	Volume 3	Nufarm Limited	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				See 830.7550
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7550
Signature 			Name and Title George Meindl, Registration Manager		Date 3/14/07






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Ingredient Picloram					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Picloram Generic Data Requirements	Cite-All Method utilized by Nufarm Limited for Picloram data requirements		Spray Drift Task Force	OWN	
Picloram Generic Data Requirements	Cite-All Method utilized by Nufarm Limited for Picloram data requirements		Outdoor Residential Exposure Task Force	OWN	
Picloram Generic Data Requirements	Cite-All Method utilized by Nufarm Limited for Picloram data requirements		Agricultural Reentry Task Force	OWN	
Picloram Generic Data Requirements	Cite-All Method utilized by Nufarm Limited for Picloram data requirements		Agricultural Handler Exposure Task Force	OWN	
Signature 			Name and Title George Meindl, Registration Manager		Date 3/14/07



## Endnotes for Data Matrix for Picloram Technical

- 
- <sup>1</sup> **830.1650** – Per OPPTS 830.1000, these data are not required for the registration of a technical grade active ingredient. See 830.1620 for production process information.
- <sup>2</sup> **830.6314, 830.6315, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7100, 830.7370** – Per OPPTS 830.1000, these data are not required for the registration of a technical grade active ingredient.
- <sup>3</sup> **830.7220** – Per OPPTS 830.1000, these data are not required for the registration of Picloram Technical because this product is a solid. Please refer to OPPTS 830.7200.

## Endnotes for Data Matrix for Picloram Technical

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# PICLORAM ACID TECHNICAL

## For Manufacturing Use Only

**ACTIVE INGREDIENT:**

Picloram: 4-amino-3, 5, 6-trichloropicolinic acid..... 93.0%

**OTHER INGREDIENTS:** ..... 7.0%

**TOTAL:** ..... 100.0%



For Chemical Spill, Leak, Fire or Exposure, Call CHEMTREC (800) 424-9300  
For Medical Emergencies Only, Call (877) 325-1840

EPA REG. NO. 35935  
EPA EST. NO.

MANUFACTURED FOR  
NUFARM LIMITED  
RTP, NC 27709



**NET CONTENTS**      **Pounds**

035935-00000.20070226.  
NUP06094

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
DANGER - POISON**

Fatal if Inhaled. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation.

Do not breathe dust. Avoid contact with eyes or clothing. For handling activities, use a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or NIOSH approved respirator with any NPR or HE filter. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

<b>FIRST AID</b>	
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following uses: rangeland and permanent grass pastures; barley, oats and wheat; fallow cropland; Conservation Reserve Program (CRP); forests; non-cropland. Because of their properties and intended uses, herbicidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finishing formulations, and are responsible for obtaining EPA registration of these products.

This technical product can only be used to formulate end-use products which have an EPA approved stewardship program in place.

All other uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration. Uses for experimental purposes that are in compliance with EPA requirements.

**HANDLING PRECAUTIONS**

Do not contaminate water: Do not allow this product to contaminate water used for irrigation, drinking or other domestic purposes. Do not clean containers near water used for these purposes.

Do not contaminate atmosphere: When formulating dry products, do not allow dust particles from this product to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE DISPOSAL:** Open dumping is prohibited. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional office for guidance.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

#### **WARRANTY DISCLAIMER**

The directions for use of this product must be followed carefully. THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

#### **LIMITATION OF LIABILITY**

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If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(RV022607)

# PICLORAM ACID TECHNICAL

## For Manufacturing Use Only

**ACTIVE INGREDIENT:**

Picloram: 4-amino-3, 5, 6-trichloropicolinic acid..... 93.0%

**OTHER INGREDIENTS:** ..... 7.0%

**TOTAL:** ..... 100.0%

	<p><b>KEEP OUT OF REACH OF CHILDREN DANGER - POISON</b></p> <p>SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS</p>	
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EPA REG. NO. 35935  
EPA EST. NO.

MANUFACTURED FOR  
NUFARM LIMITED  
RTP, NC 27709



**NET CONTENTS**      Pounds

035935-00000.20070226.  
NUP06094

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(RV022607)



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EPA EST. NO.

MANUFACTURED FOR  
NUFARM LIMITED  
RTP, NC 27709



**NET CONTENTS**      **Pounds**

035935-00000.20070226.  
NUP06094

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Do not breathe dust. Avoid contact with eyes or clothing. For handling activities, use a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or NIOSH approved respirator with any NPR or HE filter. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

<b>FIRST AID</b>	
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following uses: rangeland and permanent grass pastures; barley, oats and wheat; fallow cropland; Conservation Reserve Program (CRP); forests; non-cropland. Because of their properties and intended uses, herbicidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finishing formulations, and are responsible for obtaining EPA registration of these products.

This technical product can only be used to formulate end-use products which have an EPA approved stewardship program in place.

All other uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration. Uses for experimental purposes that are in compliance with EPA requirements.

**HANDLING PRECAUTIONS**

**Do not contaminate water:** Do not allow this product to contaminate water used for irrigation, drinking or other domestic purposes. Do not clean containers near water used for these purposes.

**Do not contaminate atmosphere:** When formulating dry products, do not allow dust particles from this product to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE DISPOSAL:** Open dumping is prohibited. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional office for guidance.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

#### **WARRANTY DISCLAIMER**

The directions for use of this product must be followed carefully. THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

#### **LIMITATION OF LIABILITY**

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(RV022607)

# PICLORAM ACID TECHNICAL

## For Manufacturing Use Only

**ACTIVE INGREDIENT:**

Picloram: 4-amino-3, 5, 6-trichloropicolinic acid..... 93.0%

**OTHER INGREDIENTS:** ..... 7.0%

**TOTAL:** ..... 100.0%

	<p><b>KEEP OUT OF REACH OF CHILDREN</b> <b>DANGER - POISON</b></p> <p>SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS</p>	
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For Chemical Spill, Leak, Fire or Exposure, Call CHEMTREC (800) 424-9300  
For Medical Emergencies Only, Call (877) 325-1840

EPA REG. NO. 35935  
EPA EST. NO.

MANUFACTURED FOR  
NUFARM LIMITED  
RTP, NC 27709



**NET CONTENTS**      Pounds

035935-00000.20070226.  
NUP06094

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
DANGER - POISON**

Fatal if inhaled. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation.

Do not breathe dust. Avoid contact with eyes or clothing. For handling activities, use a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or NIOSH approved respirator with any NPR or HE filter. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

<b>FIRST AID</b>	
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following uses: rangeland and permanent grass pastures; barley, oats and wheat; fallow cropland; Conservation Reserve Program (CRP); forests; non-cropland. Because of their properties and intended uses, herbicidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finishing formulations, and are responsible for obtaining EPA registration of these products.

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All other uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration. Uses for experimental purposes that are in compliance with EPA requirements.

**HANDLING PRECAUTIONS**

Do not contaminate water: Do not allow this product to contaminate water used for irrigation, drinking or other domestic purposes. Do not clean containers near water used for these purposes.

Do not contaminate atmosphere: When formulating dry products, do not allow dust particles from this product to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE DISPOSAL:** Open dumping is prohibited. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional office for guidance.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

#### **WARRANTY DISCLAIMER**

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#### **LIMITATION OF LIABILITY**

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If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(RV022607)



EPA

1404

# Picloram Acid Technical

For Manufacturing Use Only

## ACTIVE INGREDIENT:

Picloram: 4-amino-3,5,6-trichloropicolinic acid ..... 95.0%

OTHER INGREDIENTS: ..... 5.0%

TOTAL: ..... 100.0%

**KEEP OUT OF REACH OF CHILDREN**

## WARNING

### FIRST AID

- |                    |   |
|--------------------|---|
| <b>If in eyes:</b> | <ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul> |
|--------------------|---|

### HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

## ENVIRONMENTAL HAZARDS

This pesticide is toxic to some plants at very low concentrations. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

EPA Reg. No. 42750-

Manufactured for:  
Albaugh, Inc.  
Ankeny, IA 50021

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

42750-78

MAY 16 2005

EPA Est. No.

NET WEIGHT  
\_\_\_\_\_ Lbs.

**FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE,  
CALL CHEMTREC (800) 424-9300**



## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**Only for formulation into a herbicide for the following uses:** barley, oats and wheat; fallow cropland; rangeland and permanent grass pastures; Conservation Reserve Program (CRP); forests; noncropland.

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

## STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a cool, dry area. Open dumping is prohibited.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

## CONDITIONS OF SALE AND WARRANTY

The **DIRECTIONS FOR USE** of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of ALBAUGH, INC. or the Seller. All such risks shall be assumed by the Buyer.

ALBAUGH, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. **ALBAUGH, INC. MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS FOR ANY PARTICULAR PURPOSE OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS.**

**BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED.** When Buyer suffers losses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict liability, or other legal theories), Buyer must promptly notify Seller in writing of any claims to be eligible to receive either remedy stated above. **IN NO CASE SHALL ALBAUGH, INC. OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.** ALBAUGH, INC. and the Seller offer this product, and the Buyer accepts it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of ALBAUGH, INC.

No employee or agent of ALBAUGH, INC. or the Seller is authorized to vary or exceed the terms of this Warranty in any other manner.

#### **DISCLAIMER AND INDEMNITY FOR FORMULATORS' USES**

The manufacturer expressly disclaims all liability for claims and actions (whether based on contract, tort, strict liability, or breach of warranty) arising out of, resulting from or connected with a formulation containing this product when used for any purpose other than those uses set forth in the Directions for Use. The manufacturer has not developed scientific data to support, nor has it explicitly or implicitly approved, any uses other than those in the Directions for Use.

**Any formulator or buyer who uses this product in formulations for any other than those stated in the Directions for Use above assumes all liability for claims and actions arising out of, connected with or resulting from such use and agrees by so using this product to indemnify and hold harmless the manufacturer from such claims and actions.**

**This Disclaimer and Indemnity is in addition to, not in lieu of, the above Conditions of Sale and Warranty.**

